PYRIDIUM MERCURY II SITE

185634

ADMINISTRATIVE RECORD FILE

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Title: Abstract of Document Contents

Category: Document Category/Section of Administrative Record File

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PYRIDIUM MERCURY II SITE

ADMINISTRATIVE RECORD FILE

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PYRIDIUM MERCURY II SITE ADMINISTRATIVE RECORD FILE LIST OF DOCUMENTS

Document #: PM2 - 1.1001 - 1.1003

Title:

Mitigating Potential Exposures

Category:

Removal Response

Author:

G. Anders Carlson, Ph.D., State of New York Department of Health

Recipient:

Ms. Kathleen C. Callahan, Director, Emergency & Remedial Response Division.

United States Environmental Protection Agency

Date:

November 30, 1994

Document #: PM2 - 1.2001 - 1.2031

Title:

Request for a Removal Action at the Pyridium Mercury Disposal Site II - Action

Memorandum

Category:

Removal Response

Author:

Irmgard P. Huhn and Dan Harkay, On-Scene Coordinator

Removal Action Branch, U.S. Environmental Protection Agency

Recipient:

Jeanne M. Fox, Regional Administrator

U.S. Environmental Protection Agency

Date:

September 29, 1995

Document #: PM2 - 1.2032 - 1.2047

Title:

Request for a Removal Action at the Pyridium Mercury Disposal Site II - Action

Memorandum

Category:

Removal Response

Author:

Dan Harkay, On-Scene Coordinator

Removal Action Branch, U.S. Environmental Protection Agency

Recipient:

Kathleen C. Callahan, Director, Emergency and Remedial Response Division

U.S. Environmental Protection Agency

Date:

February 27, 1996

Document #: PM2 - 1.3001 - 1.3013

Title:

Sampling Report-Pyridium Mercury Disposal Site No. 2

Category:

Removal Response

Author:

Eric Wilson, Project Manager, Roy F. Weston, Inc. and Tom O'Neill, OC Review

Recipient:

Joseph Rotola, On-Scene Coordinator Removal Action Branch, U.S. Environmental Protection Agency

Date:

October 1994

Document #: PM2 - 1.3014 - 1.3128

Title:

Sampling Report-Extent of Contamination Study, Pyridium Mercury Disposal Site

No. 2

Category: Removal Response

Author: Eric Wilson, On-Scene Coordinator

Removal Action Branch, U.S. Environmental Protection Agency

Recipient: Public/U.S. Environmental Protection Agency

Date: June 1996

Document #: PM2 - 1.4001 - 1.4023

Title: Post Excavation Sampling QA/QC Work Plan - Pyridium Mercury Disposal Site

No. 2

Removal Response Category:

Author: Randy Komssi, START Project Manager, Roy F. Weston, Inc. and Joseph Price.

QC Review

Irmee Huhn, On-Scene Coordinator **Recipient:**

Removal Action Branch, U.S. Environmental Protection Agency

Date: December 1, 1995

Document #: PM2 - 1.5001 - 1.5008

Title: Sampling Trip Report- Pyridium Mercury Disposal Site No. 2

Category: Removal Response

Author: Randy Komssi, START Project Manager, Roy F. Weston, Inc. and Joseph Price,

OC Review

Recipient: Irmee Huhn, On-Scene Coordinator

Removal Action Branch, U.S. Environmental Protection Agency

Date: April 26, 1996

Document #: PM2 - 2.1001 - 2.1009 Title: Community Relations Plan

Category: **Public Participation**

Author: Region II Superfund Technical Assessment and Response Team **Recipient:** General Public

Date: January 1995

Document #: PM2 - 2.2001 - 2.2001

Title: Notice of Public Availability

Category: Public Participation

Author: N/A

Recipient: General Public Date: January 1996

Document #: PM2 - 2.3001 - 2.3002

Title:

The Times Herald Record - A poison sewn into the soil

Category:

Public Participation Christopher Mele

Author: **Recipient:**

General Public

Date:

October 8, 1994

Document #: PM2 - 2.3003 - 2.3003

Title:

The Times Herald Record - Memory losses alarming

Category:

Public Participation

Author:

Christopher Mele

Recipient:

General Public

Date:

October 11, 1994

Document #: PM2 - 2.3004 - 2.3005

Title:

The Times Herald Record - Harriman soil tests set

Category:

Public Participation

Author:

Amy Beth Terdiman

Recipient:

General Public

Date:

October 14, 1994

Document #: PM2 - 2.3006 - 2.3006

Title:

The Times Herald Record - Love Canal lessons shared

Category:

Public Participation

Author:

Amy Beth Terdiman

Recipient:

General Public

Date:

October 19, 1994

Document #: PM2 - 2.3007 - 2.3007

Title:

The Times Herald Record - Experts expand soil tests

Category:

Public Participation

Author:

Amy Beth Terdiman

Recipient:

General Public

Date:

October 25, 1994

Document #: PM2 - 2.3008 - 2.3008

Title:

The Times Herald Record - New year will bring new start

Category:

Public Participation

Author:

Amy Beth Terdiman

Recipient:

General Public

Date:

December 31, 1994

Document #: PM2 - 2.3009 - 2.3009

Title:

The Times Herald Record - Toxic site residents prepare to relocate

Category: Public Participation Author: Amy Beth Terdiman

Recipient: General Public

Date: N/A

Document #: PM2 - 2.3010 - 2.3010

Title: The Times Herald Record - Mercury deposit remains a mystery

Category: Public Participation

Author: N/A

Recipient: General Public Date: October 12, 1994

Document #: PM2 - 2.3011 - 2.3011

Title: The Times Herald Record - Village water mercury free, mayor tells residents

Category: **Public Participation**

Author: N/A

Recipient: General Public October 12, 1994 Date:

Document #: PM2 - 2.3012 - 2.3012

Title: The Times Herald Record - EPA searches for extent of contamination

Category: Public Participation **Author:** Amy Beth Terdiman Recipient: General Public

Date: October 13, 1994

Document #: PM2 - 3.1001 - 3.1002

Title: EPA Regional Guidance Documents

Technical Source and Guidance Documents Category: Author: U.S. Environmental Protection Agency

Recipient: General Public

Date: N/A

Document #: PM2 - 4.1001 - 4.1026

Title: Health Consultation Pyridium Mercury Disposal Site #2

Category: Health Assessments

Author: New York State Department of Health Under a Cooperative Agreement with U.S.

Department of Health & Human Services, Public Health Service, and Agency for

Toxic Substances and Disease Registry

General Public Recipient: Date: August 28, 1995

CERTIFICATION OF DOCUMENTS

COMPRISING THE ADMINISTRATIVE RECORD

The United States Environmental Protection Agency(USEPA) hereby certifies that the attached documents constitute the Administrative Record for selection of response actions under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, for the **Pyridium Mercury Disposal #1**, located on the village of Harriman Tax Map as Section 103, Block 5, Lot 2, on Route 17M and **Pyridium Mercury Disposal #2** located on the Village of Harriman Tax Map as Section 106, Block 5, Lot 13 in the Town of Harriman, County of Orange, New York, CERCLIS ID # NY0000856237 and #NY0001062850; Spill Id 02EZ and 02EV, respectively.

By the EPA:

In witness whereof I have subscribed my

name this 30th day of March, 2004,

in Edison, New Jersey.

Irmgard P. Huhn, USEPA Region II.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION II

290 BROADWAY NEW YORK, NEW YORK 10007-1866

ACTION MEMORANDUM

DATE:

FEB 27 1998

SUBJECT:

Documentation of Verbal Authorization for a Removal Action at the Pyridium Mercury Disposal Site No. 2,

Village of Harriman, Orange County, New York

FROM:

D. Harkay, on-Scene Coordinator

Removal Action Branch

TO:

Kathleen C. Callahan, Director

Emergency and Remedial Response Division But Selle.

THRU:

Ŕichard C. Salkie, Associate Director

Removal and Emergency Preparedness Programs

Site ID: EZ

I. **PURPOSE**

The purpose of this Action Memorandum is to document the verbal authorization received to conduct a removal action at the Pyridium Mercury Disposal Site No. 2 (Site). The Site is located at 40 South Main Street, Village of Harriman, Orange County, New York, 10926. The Site is a residential property which has been back-filled with mercury-contaminated industrial waste. A twostory house, located on the property, is rented and occupied by a woman and her two children. This document details the rationale used to conduct the removal activities implemented at the Site and discusses how the Site met the criteria for a removal action under Section 300.415(b)(2) of the National Contingency Plan (NCP).

On February 16, 1995, the U.S. Environmental Protection Agency (EPA) Director of Emergency and Remedial Response Division (ERRD) granted verbal authorization to conduct a removal action at the Site to secure and limit access to the mercury contaminated waste disposal area in front of the affected residential house. funding approval to secure the Site was \$50,000, of which \$30,000 was for mitigation contracting.

The Site is not on the National Priorities List (NPL) and there were no nationally significant precedent-setting issues associated with the removal action.

II. SITE CONDITIONS AND BACKGROUND

The Comprehensive Environmental Response, Compensation, and Liability Information System ID number for this time-critical removal action is NY0001062850.

A. Site Description

1. Removal site evaluation

On October 21, 1994, a representative of the New York State Department of Health (NYSDOH) and the Village of Harriman Code Enforcement Officer (CEO) conducted an investigation of the Site. A whitish-grey solid, similar to the waste found at the Pyridium Mercury Disposal Site No. 1 (Pyridium 1), was discovered at the surface where a tree root broke through the soil. The waste was also observed in a residential front yard a few inches below the surface in small holes dug by the resident's pet dog.

On October 26, 1994, at the request of NYSDOH, the EPA and the Technical Assistance Team (TAT) collected three surface soil samples and two waste samples to determine if the Site was contaminated with mercury. Mercury was detected at concentrations ranging from 0.14 mg/kg to 27.5 mg/kg in the surface soils. Mercury was detected at concentrations ranging from 227 mg/kg to 456 mg/kg in the waste samples, collected from depths of 1 to 6 inches below the surface.

On October 29, 1994, nine additional surface soil samples (0 to 3 inches below any vegetative cover) were collected from a fenced portion of the yard which was used as a play area by the children and the pet dog living at the house located on the Site. Mercury was detected in the surface soils at concentrations ranging from 0.16 mg/kg to 117 mg/kg with an average of 35.1 mg/kg.

On November 17, 1994, the EPA Environmental Response Team (ERT) and the Response Engineering and Analytical Contractor (REAC) collected dust samples inside the house at the Site. Mercury was detected at concentrations of 1.38 mg/kg and 2.06 mg/kg in two dust samples collected from inside the house.

On November 30, 1994 the Site was formally referred to the EPA for Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) removal action consideration via a letter from NYSDOH (Appendix A) and verbally confirmed by the New York State Department of Environmental Conservation.

On December 7, 1994, ERT, REAC, and TAT collected eleven soil borings on the Site to determine the extent of contamination. Soil samples collected from the borings were screened for mercury using a Spectrace Model 9000 X-Ray Fluorescence Analyzer.

Based on this and previous sampling it is estimated that approximately 500 cubic yards of waster and contaminated soil are present at the Site.

Site residents have been informed of the results of EPA's sampling and have been advised to limit their usage of contaminated areas on the property. A NYSDOH physician has discussed site-specific health concerns with the residents.

2. Physical location

Pyridium 2 is located in a mixed residential/commercial area on South Main Street, near the intersection of Route 17M and South Main Street (Appendix B, Figure 1). The Site is bordered on the northwest by a vacant lot, on the northeast by South Main Street, on the southeast by Ramapo Lane, and on the southwest by a gasoline service station. Two major thoroughfares, New York Routes 17 and 17M, are located less than a half mile from the Site. A grade school and playground are located within a half mile of the Site.

3. Site characteristics

The property encompasses 0.25 acres. The Site includes a nineteenth century farmhouse which predates the waste disposal activities. The two-story farmhouse has a stonewall basement with a concrete floor. The property is owned by Mr. Greg Epsaro of 4 Averill Avenue, P.O. Box 104, Harriman, New York. For the past three years, a woman and her two small children, ages six and seven, have rented and occupied the house.

In the early 1950's, approximately eight to 15 truckloads of waste were allegedly dumped in a "L" shaped configuration across the front yard. The waste was allegedly a mercuric or mercurous salt generated during the production of pyridium by the former Pyridium Corporation. The waste was used to backfill low-laying areas of the front yard.

This is the first removal action undertaken by the EPA at the Site.

4. Release or threatened release into the environment of a hazardous substance, or pollutant, or contaminant

Site investigations indicate that approximately 500 cubic yards of waste are present at the Site. Analytical results of the waste samples indicate elevated concentrations of mercury (max. 456 mg/kg). Mercury is a designated CERCLA hazardous substance as defined by Section 101(14) and is listed in 40 CFR Table 302.4. Mercury is typically found in soils in this geographic location at levels of less than 1 mg/kg.

Sampling conducted by EPA identified elevated concentrations of mercury at and below the ground surface. Mercury contaminated waste and soil present at the surface could migrate off-site by anthropogenic redistribution and surface water runoff and contaminate a larger area.

5. NPL status

The Site is not listed on the NPL. A Preliminary Assessment (PA) may be conducted to determine the need for a Site Inspection (SI) for possible NPL listing. The Site was evaluated by the Agency for Toxic Substances and Disease Registry (ATSDR). The January 1995 draft health consultation is included in Appendix C.

6. Maps, pictures and other graphic representations

Figures 1 and 2 in Appendix B provide the location and configuration of the Site.

B. Other Actions to Date

1. Previous actions

On November 28, 1994, EPA, ATSDR and NYSDOH held a public availability session to address community concerns regarding the potential health effects associated with Pyridium 1 and 2. The analytical results of the soil sampling events were made available to the public during the meeting.

Results of the EPA samples were submitted to ATSDR and NYSDOH for a health consultation. In January 1995, a Draft Health Consultation Report was prepared by the NYSDOH under a cooperative agreement with the ATSDR (Appendix C). The report states that the Pyridium Mercury Disposal Site No. 2 is a public health hazard due to the elevated concentrations of mercury in soils. On-site residents are suspected to be at risk of kidney damage through mercury ingestion, inhalation and dermal contact.

2. Current actions

The purpose of the current action was to secure the Site and minimize the potential for direct contact with mercury contaminated soil and waste. On February 27, 1995, EPA, Emergency Response Cleanup Services (ERCS) contractor and TAT mobilized to the Site to secure and limit access to the waste disposal area.

In order to secure the area, the existing fence was modified to enclose the area of contamination present in the front portion of the property. Additionally, to minimize the potential for continued exposure, a chain-link-fence enclosure was installed in an uncontaminated portion of the rear property to provide a

clean, secure play area for the children and family pet that reside on the Site.

Although mercury concentrations identified in dust samples collected from living areas in the residence were not at levels of public health concern, carpets and vinyl flooring were vacuumed and/or washed as a precautionary measure to remove any residual mercury which may have been tracked into the house by the children's or pet's outdoor activities.

The mitigation contracting cost to complete this removal action was approximately \$12,000.

C. State and Local Authorities' Role

1. State and local actions to date

In October 1994, the NYSDOH and the Village of Harriman CEO conducted an investigation and discovered the waste at the Site. NYSDOH prepared the Health Consultation in conjunction with ATSDR and participated in public meetings and public availability sessions. A NYSDOH physician consulted with site residents regarding site-specific health concerns.

2. Potential for continued State/local response

State and local government agencies were unable to undertake timely and costly response actions to eliminate the threats posed by the Site. However, the NYSDOH offered health education services to the affected residents. The NYSDOH will investigate similar sites in the community as they are identified.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The Site met the criteria for a Removal Action under CERCLA as described in Section 300.415(b)(2) of the NCP. The Site poses a health threat to on-site and local residents and animals that could come in direct contact with the hazardous substances at the Site.

A. Threats to Public Health or Welfare

Elevated concentrations of mercury, a designated CERCLA hazardous substance, have been documented in surface and subsurface soils. On-site and local residents may have been exposed to mercury through the ingestion of mercury contaminated soil, the consumption of plants grown in contaminated soils, dermal contact with the waste or inhalation of mercury contaminated dust. Toxicological data regarding mercury exposure documents the risk of potential kidney and neurological system damage.

B. Threats to the Environment

High concentrations of hazardous substances located at or near the ground surface have migrated and have contaminated a larger area through surface water runoff and anthropogenic redistribution.

Local animal populations may have come into direct contact with hazardous substances located at or near the surface.

IV. ENDANGERMENT DETERMINATION

Actual or threatened release of a hazardous substance from this Site, if not addressed by implementing the response action selected in this Action Memorandum, would have presented an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The purpose of this Action Memorandum is to document actions taken by EPA at the Site under the February 16, 1995 verbal authorization of the Director of the ERRD. The removal action minimized the potential for direct contact with the mercury contaminated soil and waste. A chain-link fence was erected to prevent the children from playing in the contaminated area and to provide a clean, secure area for the children and family pet to play. Additionally, the pre-existing fence on the front property was modified to totally enclose the area of contamination. The activities performed under this Action Memorandum cost an estimated \$12,000 for mitigation contracting and were completed on March 9, 1995.

Additional actions are necessary at the Site which may include the excavation and disposal of contaminated soil and the restoration of the Site to pre-excavation conditions. These actions will be undertaken under a separate removal action.

2. Contribution to remedial performance

The actions presented in this document were consistent with any long term cleanup at the Site and were interim measures necessary to mitigate the immediate threats associated with the hazardous substance on the property.

3. Description of alternative technologies

No other alternative technologies were considered for securing the Site, since the option chosen was environmentally safe and cost effective to mitigate the immediate threat to on-site and local residents.

4. Engineering Evaluation/Cost Analysis (EE/CA)

Due to the time-critical nature of this removal action, an EE/CA was not prepared.

5. Applicable or relevant and appropriate requirements (ARARs)

ARARS that were within the scope of this removal action were met to the extent practicable. The federal ARARS determined to be applicable for this removal action was the Occupational Safety and Health Act.

6. Project schedule

The removal actions in this Action Memorandum were initiated on February 27, 1995 under verbal authorization from the Director of the ERRD and completed on March 9, 1995.

B. Estimated Costs

A summary of the estimated costs for the completed removal action is presented below.

Extramural Costs:

		· · · · · · · · · · · · · · · · · · ·		
Total	Cleanup	Contractor	Costs	(ERCS)

\$12,000

Other Extramural Costs Not Funded from the Regional Allowance:

Total TAT	•	<u>\$ 4,000</u>

12 3

TOTAL, EXTRAMURAL COSTS \$16,000

Intramural Costs:

TOTAL, INTRAMURAL COSTS \$ 2,000

TOTAL, REMOVAL PROJECT CEILING \$18,000

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

The actions outlined in this Action Memorandum were an interim measure to secure the Site and mitigate the immediate threat to on-site and local residents. If no action was taken or the planned action delayed, the on-site residents would continue to be exposed to hazardous substances present at the Site.

VII. OUTSTANDING POLICY ISSUE

No known outstanding policy issues were associated with the Site.

VIII. ENFORCEMENT

Site-related enforcement activities were initially limited due to time constraints resulting from the time-critical determination for the removal action.

In October 1994, EPA TAT conducted a title and deed search of the property. Property owner information was obtained from 1894 to the present and is being kept on file.

The on-site waste was reportedly generated during the 1940's and 1950's by the Pyridium Corporation. Nepera, Inc., currently owns and operates the facility previously operated by Pyridium Corporation.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Pyridium Mercury Disposal Site No. 2 in the Village of Harriman, Orange County, New York, developed in accordance with CERCLA, as amended, and not inconsistent with the NCP. This decision was based on the administrative record for the Site.

Conditions at the Site met the NCP Section 300.415(b)(2) criteria for the completed removal action. The total estimated project ceiling cost for this phase of the removal action is \$18,000, of which \$12,000 came from the Regional removal allowance.

Please confirm the February 16, 1995 verbal authorization of funding for this Site, as per current Delegation of Authority, by signing below.

APPROVAL:	Kathleen CV Callahan, Director Emergency and Remedial Response	DATE: <u>2/27/96</u> Division
DISAPPROVAL:		DATE:
	Kathleen C. Callahan, Director Emergency and Remedial Response	Division

cc: (after approval is obtained)

- J. Fox, RA
- R. Salkie, ERRD-ADREPP
- W. McCabe, ERRD-DDNYC/P
- G. Zachos, ERRD-RAB
- J. Rotola, ERRD-RAB
- M. Randol, EPD
- E. Schaaf, ORC-NYCSUP
- V. Capon, ORC-NYCSUP

- R. Gherardi, OPM-FIN
- S. Murphy, OPM-FAM
- D. Dietrich, 5202G
- T. Eby, 5202G
- C. Moyik, ERRD-PS
- M. O'Toole, NYSDEC
- T. Vickerson, NYSDEC
- C. Kelly, TATL

APPENDIX A

Center for Environmental Health

2 University Place

Albany, New York 12203-3399

Mark Cassin, M.D. M.P.P. M.A. Confinishoner

Paula Mison

Executive Deputy Commissioner

PARE LIVE S. S. P. C. M. S. P. C. M.

.....

OFFICE OF PUBLIC HEALTH

Lloyd F. Novick, M.D., M.P.H. Director

Diana Jones Ritter

Executive Deputy Director

William N. Stasiuk, P.E., Ph.D. Center Director

November 30, 1994

Ms. Kathleen C. Callahan, Director Emergency & Remedial Response Division United States Environmental Protection Agency Region II 26 Federal Plaza New York, New York, 10278

RE:

Mitigating Potential Exposures

Pychilan Mercury Site # 35

NYSDOH Site #336822N

(V)Harriman, Orange County

Dear Ms. Callahan:

On October 21, 1994, my staff investigated a report of a possible second Pyridium Mercury Disposal site at 40 South Main Street in the Village of Harriman, Orange County. A mother and her two children, ages 6 and 7, are the only current residents. Allegedly, eight to fifteen truckloads of the Pyridium wastes were used as fill in the front yard of a single family residence during the early 1950's. Shoveled test holes were dug with the assistance of the property owner and the Village of Harriman Code Enforcement Officer. A Nepera, Inc. official was present during this preliminary inspection. Whitish gray Pyridium-like wastes were discovered a few inches below the ground surface at several locations in the front yard of this late 1800's home. Surface wastes were observed only where a large willow tree root broke through the grass cover. This spot was immediately covered over by investigators to minimize casual contact.

At our request, the United States Environmental Protection Agency (EPA) collected one surface soil, two subsurface soil, and two subsurface waste samples on October 26, 1994. The results of the testing demonstrated that there are significantly elevated levels of mercury in the subsurface wastes (two samples: 227 and 456 parts per million (ppm) of total mercury). The surface soil sample collected within the fenced yard, where the two children and family dog spend much of their play time, contained 27.5 ppm of total mercury. Because mercury is typically found in soils at levels less than 1 ppm, we and a representative of the federal Agency for Toxic Substances and Disease Registry recommended confirmatory surface soil sampling within the play yard. On October 29, 1994 the EPA collected nine additional surface soil (0 to 3 inches below any vegetative cover) samples to further assess the extent of surface contamination so that appropriate public health decisions could be made. Total mercury levels ranged from 0.1 to 117 ppm with an average of 35.1 ppm. Mercury contamination appears to increase markedly from the front porch cutward

toward the reported area of historic waste disposal. Based on field observations, less obvious mercury contamination detected in surface soils within the fenced play area may be the direct result of the family's pet repeatedly digging in the yard.

Exposure to either inorganic or organic mercury can permanently damage the brain, kidneys, and developing fetus. The most sensitive target of low-level exposure to inorganic mercury appears to be the kidneys. Exposure to mercury in the soil can occur through a number of routes. There is the potential for direct oral exposure via ingestion of soil, dust, and garden produce grown in contaminates soil. Mercury can be absorbed into the body via dermal contact through activities associated with soil disturbances such as gardening, yard work, and play. The potential for inhalation of mercury particulates and mercury vapor is also a concern.

The elevated levels of mercury in soil are a public health concern. To minimize potential human exposure to these chemical wastes, the tenant and the property owner have been advised to avoid physical contact with front yard soils and to avoid disturbing any soils whatsoever. Based on the results of the EPA's follow-up sampling, the mother has been advised to keep her children and dog out of the fenced play area. Vegetable gardening is not recommended. These temporary advisories should be followed by a permanent solution as the presence of these wastes on a residential property pose a current and future threat to public health.

With this information, I am seeking the EPA's assistance in reducing or eliminating the conditions causing this potential human health hazard in the Village of Harriman. I am further asking that the EPA either enter into an Order on Consent with Nepera, Inc. or else respond to this situation using federal Superfund monies to assure that the presence of this hazardous substance within a residential neighborhood is satisfactorily addressed to eliminate the exposure potential. It is important to note that as a result of public meetings and media attention associated with the first Pyridium Mercury Disposal (trailer park) site which is just up the road, the community has a heightened desire for a thorough investigation and clean-up of this property as well as any others that may be discovered with similar wastes in the future.

We look forward to working with the EPA toward a satisfactory resolution of this sensitive public health issue. Should you wish to discuss the matter further, do not hesitate to contact me at (518) 458-6310.

Sincerely,

G. Anders Carlson, Ph.D.

Director

Bureau of Environmental Exposure

I lunders Ceal

Investigation

sms/94300PRO0671

Dr. N. Kim CC:

Mr. S. Bates/Mr. M. Valkenburg

Mr. J. Crua

Mr. M. Knudsen

Ms. N. Knapp

Mr. S. Abrams

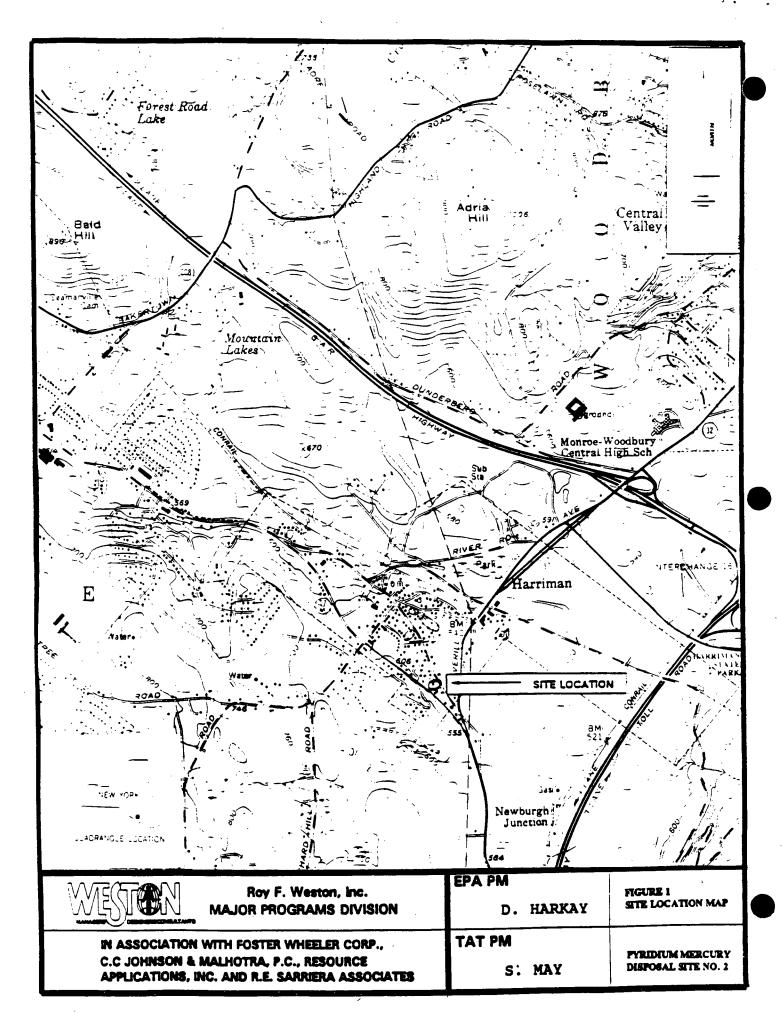
Mr. M. Schleifer - OCHD

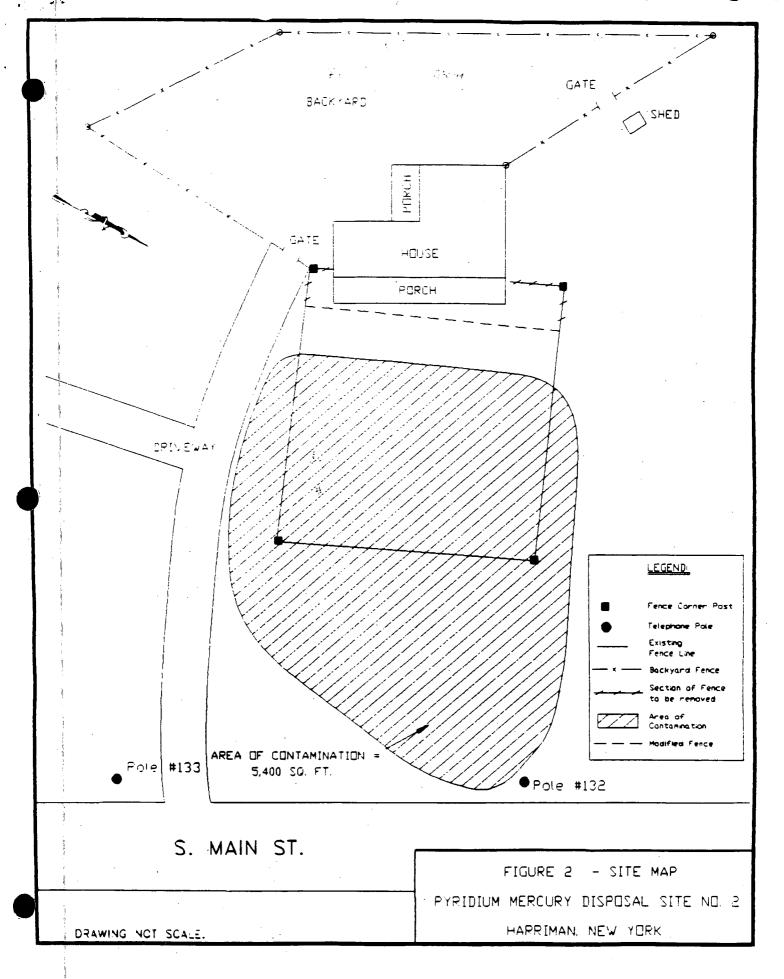
Mr. M. O'Toole - DEC

Mr. S. Ervolina/ Ms. S. McCormick - DEC Mr. A. Klauss - DEC Region 3 Mr. G. Zachos/Mr. J. Rotola - EPA Region II Mr. A. Block/Mr. S. Jones - ATSDR

Mr. D. Humphrey - Mayor of Harriman

APPENDIX B





APPENDIX C

PLEASE REFER TO SECTION 4, PM2 - 4.1001 - 4.1026 FOR THE FINAL HEALTH ASSESSMENT

SAMPLING REPORT PYRIDIUM MERCURY DISPOSAL SITE NO. 2

VILLAGE OF HARRIMAN ORANGE COUNTY, NEW YORK

OCTOBER 1994

Prepared for:

U.S. Environmental Protection Agency Region II Removal Action Branch Joseph Rotola, On-Scene Coordinator

Prepared by:

Roy F. Weston, Inc. Technical Assistance Team

> Eric Wilson Project Manager

Tom O'Neill

QC Review

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Figure I

Sample Location Map

Figure II

Mercury Concentration Map

1. INTRODUCTION

1.1 Site Background

The Pyridium Mercury Disposal Site No.2 is a residential property located at the west corner of the intersection of Ramapo Lane and South Main Street in the Village of Harriman, Orange County, New York.

The U.S. Environmental Protection Agency (EPA) was notified by the New York State Department of Health and the Village of Harriman, that material similar to that found at the Pyridium Mercury Disposal Site No.1 was present at this property. Waste found at the Pyridium Mercury Disposal Site No.1 has been found to contain mercury at concentrations as high as 656 mg/kg.

1.2 Sampling Objectives

The EPA Region II On-Scene Coordinator (OSC) tasked the Roy F. Weston, Inc. Technical Assistance Team (TAT) with conducting an investigation to identify the presence of mercury in surface soils at the site.

2. METHODOLOGY

2.1 Sampling Summary

Sampling was conducted on October 26 and 29, 1994. Soil borings were advanced to make a visual determination of the existence of waste. Soil samples were collected and delivered to a laboratory for analysis for total mercury.

2.2 Soil Borings

Soil borings were advanced using a hand shovel and hand anger. If grass was present at the boring location, the turf was cut and removed to reveal the underground soils. Borings were advanced to a minimum depth of 12 inches below existing grade. Observations were recorded in the field logbook. In some cases, soil samples were collected from the bore holes. After completion of the soil boring, soil was replaced and compacted, and the turf was replaced.

Tools used to advance the bore holes were cleaned with water between borings.

A map depicting soil boring and sampling locations is included as Figure I.

2.3 Soil Sampling

In all cases where soil borings and sampling were conducted at the same location, soil borings were performed first. In cases where a surface soil sample was collected at a boring location, a separate boring was advanced adjacent to the observation bore hole for collection of the sample. This precaution was taken to avoid cross contaminating surface soils with underlying waste.

Soil samples were collected using dedicated, disposable, plastic scoops. Samples were placed in precleaned sample jars, capped and labeled. Sample chain of custody procedures were followed for all samples. Samples were delivered by hand to ICM Laboratories, Randolph, New Jersey for analysis for total mercury.

3.0 RESULTS

3.1 Soil Borings

The results of soil borings and sample descriptions are presented in Table 1.

3.2 Soil Sampling for Total Mercury

The results of analysis of soil and waste samples for total mercury are presented in Table 2.

4.0 DISCUSSION OF RESULTS

The results of the analysis for total mercury have been reviewed and meet the quality assurance criteria for QA2 as defined in Quality Assurance/Quality Control Guidance for Removal Activities (EPA 540/G-90/004, April 1990). These data are useable, as qualified.

Waste samples SB4-1, SB5-1 and SB5-2 have been found to contain mercury at concentrations of 227, 434 and 477 mg/kg respectively.

Surface soil sample SS-1, collected October 26, 1994 from the fenced in portion of the front yard revealed trace quantities of a white material that was presumed to be waste. This sample was analyzed and found to contain 27.5 mg/kg of mercury. Nine additional surface soil samples were collected on October 29, 1994; these samples were collected in a rectangular grid pattern, with 20 foot spacing between samples. With the exception of sample location N50W50, all samples were found to contain mercury at levels above the concentration range of mercury found in uncontaminated soil in the Albany, New York area (Reference 1). A map showing the mercury concentration at each sampling location is included as Figure II.

Boring ID	Description
SS-1	0-1 inch, topsoil mixed with white particulate.
	Grab soil sample SS-1 collected 0-1 inch below ground surface.
Boring #1	Boring advanced to 18 inches below grade. No waste observed.
	No sample collected.
Boring #2	Boring advanced to 14 inches below grade. No waste observed.
	Grab soil sample SB2-1 collected from 0-3 inches below ground surface.
Boring #3	Boring advanced to 12 inches below grade. No waste observed.
	Grab soil sample SB3-1 collected from 0-3 inches below ground surface.
Boring #4	Boring advanced to 18 inches below grade. Waste observed from 3-18 inches.
·	Grab waste sample SB4-1 collected at a depth of 3-6 inches below grade.
Boring #5	Boring advanced to 12 inches below grade. Waste observed from 1-12 inches, lower limit of waste not found.
	Grab waste sample SB5-1 and duplicate SB5-2 collected 1 to 6 inches below grade.
N10W10	Boring advanced to 36 inches below grade. 0-9 inches - topsoil. 9-24 inches - white pasty solid. 24-36 inches - soil mixed with small stone.
	Grab soil sample N10W10 collected 0-3 inches below ground surface.
N10W30	Boring advanced to 18 inches below grade. 0-14 inches - topsoil. 14-18 inches - white pasty solid.
	Grab soil sample N10W30 collected 0-3 inches below ground surface.
N10W50	Boring advanced to 20 inches below grade. 0-20 inches - topsoil mixed with white granular material (similar to soil extender).
	Grab soil sample N10W50 collected 0-3 inches below ground surface.

Boring ID	Description
N30W10	Boring advanced to a minimum of 6 inches below ground surface. 0-6 inches - topsoil. Waste encountered at 6 inches below ground surface. Grab soil sample N30W10 collected 0-3 inches below
N30W30	ground surface. Boring advanced to 22 inches below ground surface. 0-10 inches - topsoil. 10-18 inches - white pasty solid mixed with black ash. 18-22 inches - soil mixed with construction debris. Grab soil sample N30W30 collected 0-3 inches below ground surface.
N30W50	Boring advanced to 26 inches below ground surface. 0-6 inches - topsoil mixed with wood chips. No waste observed. Grab soil sample N30W50 collected 0-3 inches below ground surface.
N50W10	Boring advanced to 18 inches below ground surface. 0-18 inches - topsoil. No waste observed. Grab soil sample N50W10 collected 0-3 inches below ground surface.
N50W30	Boring advanced to 18 inches below ground surface. 0-12 inches - topsoil. 12-18 inches - white pasty solid mixed with debris. Grab soil sample N50W30 collected 0-3 inches below ground surface.
N50W50	Boring advanced to 18 inches below ground surface. 0-18 inches - topsoil mixed with rocks. Grab soil sample N50W50 and duplicate N50W50-A collected at 0-3 inches below ground surface.

Table 2
Mercury Concentration in Soil and Waste

Sample ID	Mercury Conclusion (mg/kg)
SS-1	27.5
SB2-1	0.14
SB3-1	0.16
SB4-1	227
SB5-1	434
SB5-2	477
N10W10	117
N10W30	41.5
N10W50	1.0
N30W10	111
изомзо	11.9
N30W50	2.1
N50W10	7.2 L\.
N50W30	23.4
N50W50	0.06B
N50W50-A	0.06B

B - Indicates sample was detected at a concentration greater than the method detection limit and less than the method quantitation limit. Concentrations are estimates.

5.0 CONCLUSIONS

- 1. The white pasty solid found on site is similar in appearance and contains similar quantities of mercury as the waste found at the Pyridium Mercury Disposal Site No. 1.
- 2. Mercury contamination is widespread in surface soils within the fenced-in portion of the front yard of the residence located on site.

6.0 REFERENCES

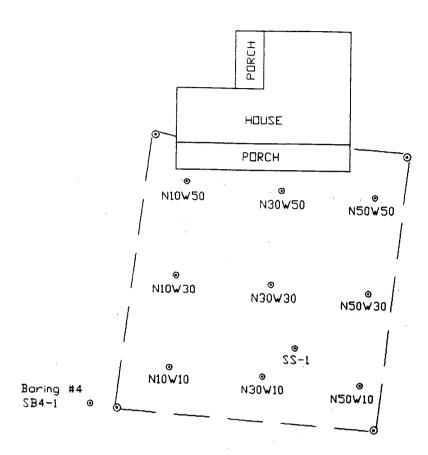
Shacklette, Hansford T. and Josephine G. Boerngen.
 1984. <u>Elemental Concentrations in Soils and Other</u>
 <u>Surficial Materials in the Conterminous United States.</u>
 U.S. Geological Survey Professional Paper 574-D Vol 713-715A.

ATTACHMENT 1

FIGURES

⊙ Boring #1

• Boring #2 SB2-1



Boring #5SB5-1SB5-2

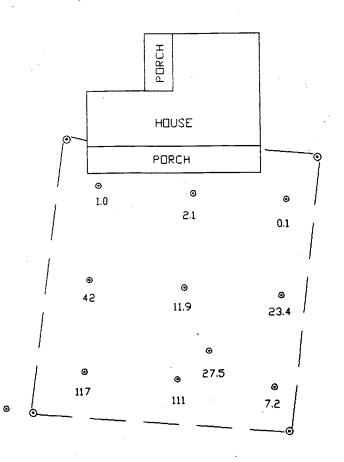
e Boring #3 SB3-1

⊙ Pole #133

● Pole #132

<u>LEGENTS</u> Boring/Sampling Location	FIGURE 1 - SAMPLE LOCATION MAP
⊙ Fence Corner Post	PYRIDIUM MERCURY DISPOSAL SITE NO. 2
Telephone Pole Fence line	HARRIMAN, NEW YORK
Scale 1' = 20'	OCTOBER 26 - 29, 1994

0.1



227

456

0.2

⊙ Pole #133

⊙ Pole #132

LEGEND: © Sample Location © Fence Corner Post	FIGURE 2- MERCURY CONCENTRATION MAP
Telephone Pale	PYRIDIUM MERCURY DISPOSAL SITE NO. 2
227 Mercury concentration (mg/kg)	HARRIMAN, NEW YORK
Scale i" = 20"	OCTOBER 26 - 29, 1994

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POST EXCAVATION SAMPLING QA/QC WORK PLAN

PYRIDIUM MERCURY DISPOSAL SITE No. 2 VILLAGE of HARRIMAN ORANGE COUNTY, NEW YORK

Prepared for

United States Environmental Protection Agency Region II - Removal Action Branch Edison, New Jersey 08837

Prepared by

Superfund Technical Assessment and Response Team
Roy F. Weston, Inc.
Federal Programs Division
Edison, New Jersey 08837

DCN #: START-02-F-00026 TDD #: 95-10-0035 PCS #: 1037 EPA Contract N0.: 68-W5-0019

START

START Project Manager

START

Date: 121/95

START QC

EPA

Que the Date: Date

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LIST OF APPENDICES

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Appendix B	Post Excavation Sampling Map
Appendix C	Soil Sampling SOP

1.0 BACKGROUND

The Pyridium Mercury Disposal Site No. 2 is a residential property located at 40 South Main Street, Village of Harriman, Orange County, New York (See Appendix A). The site is a ¼-acre residential property, back-filled with mercury-contaminated industrial waste. The site includes a two-story, farmhouse pre-dating the waste disposal activities. For the past three years, a family has rented the farmhouse.

In the early 1950's approximately 8 to 15 truckloads of waste were allegedly dumped in an L-shaped pattern in the front yard. The waste was allegedly a mercuric or mercurous salt generated during the production of niacinamide (Vitamin B-3) by the former Pyridium Corporation. The waste was used to back-fill low-lying areas of the front yard. Part of the mercury waste disposal area by the front porch was later fenced.

Site investigations, conducted by the EPA and the New York State Department of Health (NYSDOH) in October and December 1994, indicated approximately 500 cubic yards of waste were used as back-fill. Analytical results of the waste samples indicate elevated mercury concentrations, as high as 477 milligrams per kilogram (mg/kg). Previous studies show typical soil background mercury concentrations to be less than 1 mg/kg in this geographic location.

In January 1995, a Draft Health Consultation Report was prepared by the NYSDOH under a cooperative agreement with the Agency for Toxic Substances and Disease Registry (ATSDR). The report states that the Pyridium Mercury Disposal Site No. 2 is a public health hazard due to the high mercury concentrations in the soil. Residents are suspected to be at risk of kidney damage through mercury ingestion, inhalation and dermal contact.

2.0 DATA USE OBJECTIVES

The objective of this sampling event is to determine if the extent of mercury contamination has been successfully removed to cleanup levels adopted for the Pyridium Mercury site.

3.0 QUALITY ASSURANCE OBJECTIVES

As identified in Sections 1.0 and 2.0 the objective of this project/event applies to the following parameters:

Parameters	<u>Matrix</u>	Intended Data Use	OA Objective
Mercury	Soil	Verify attainment of cleanup levels	QA-2

4.0 APPROACH AND SAMPLING METHODOLOGIES

4.1 Sampling Equipment

The following equipment will be utilized to obtain environmental samples from the respective media/matrix:

<u>Parameter</u>	Sampling Equipment	Fabrication	<u>Dedicated</u>
Mercury	Disposable Scoop	Plastic	Yes

All sample containers will be Eagle-Pitcher Brand pre-cleaned laboratory glassware, as specified by the EPA Sample Management Office Contract Lab Program. Separate sampling equipment will be dedicated for use at each sample location to eliminate the need for equipment decontamination. Rinsate samples will not be needed since sampling equipment will not be decontaminated and reused. Plastic scoops will be wiped clean after use to prevent the possible spread of existing contamination. Plain paper napkins will be utilized for the wipe-down process. All sampling spoons and used protective clothing will be bagged and stored on site for disposal during future remedial or removal actions.

4.2 <u>Sampling Design</u>

The primary contaminant of concern at this site is mercury. This metal is the most widespread contaminant at the site and has been chosen as the target compound to define the limits of excavation.

One sample will be taken every 30 linear feet around the perimeter of the excavation. Each sample will be taken from the bottom of the sidewall where the bottom and the sidewall meet. In addition to the perimeter sampling, one sample will be taken at the bottom of the excavation approximately every 900 square feet. A total of 18 samples will be obtained (See Appendix B for proposed sample locations). All sampling activities will be performed by Region II START under the supervision of the EPA On-Scene-Coordinator (OSC). Tables 1 and 2 outline the analytical parameters and number of samples to be collected, respectively.

Table 1: Analytical Parameters

Analytical Parameters	Number of Sample Locations	Sample Matrix Conc.	Sample Prep./ Analytical Methods	Sample Preservation	Holding Time	Clean-up Levels
Mercury	18	Soil/low conc.	To be Determined	None	No holding time	25 ppm Hg

Table 2: Mercury Sample Totals

MERCURY	SITE
Number of mercury sample locations	18 samples
Quantity and container size/location	2 x 8 oz.
Number of Environmental Duplicates	1 per 20 samples
Number of Matrix Spike samples	1 per 20 samples
Number of Performance Evaluation (PE) samples	N/A
TOTAL Number of mercury samples	38 samples

4.3 Standard Operating Procedures

4.3.1 Sample Documentation

All sample documents must be completed legibly, in ink. Any corrections or revisions must be made by lining through the incorrect entry and by initiating the error.

FIELD LOG BOOK

The Field Log Book is essentially a descriptive notebook detailing site activities and observations so that an accurate account of field procedures can be reconstructed in the writer's absence. All entries should be dated and signed by the individuals making the entries, and should include (at a minimum) the following:

- 1. Site name and project number.
- 2. Name(s) of personnel on site.
- 3. Dates and times of all entries (military time preferred).
- 4. Descriptions of all site activities, including site entry and exit times.
- 5. Note worthy events and discussions.
- 6. Weather conditions.
- 7. Site observations.
- 8. Identification and description of samples and locations.

- 9. Subcontractor information and names of on-site personnel.
- 10. Date and time of sample collections, along with chain-of-custody information.
- 11. Record of photographs.
- 12. Site sketches.

SAMPLE LABELS

Sample labels must clearly identify the particular sample, and should include the following:

- 1. Site name and number.
- 2. Date and time sample was taken.
- 3. Sample preservation.
- 4. Initial of sampler(s).
- 5. Brief sample description.

Optional, but pertinent, information:

- 1. Analysis requested.
- 2. Sample location.

Sample labels must be securely affixed to the sample container. Tie-on labels can be used if properly secured.

CHAIN OF CUSTODY RECORD

A Chain of Custody record must be maintained from the time the sample is taken to its final deposition. Every transfer of custody must be noted and signed for, and a copy of this record kept by each individual who has signed. When samples (or groups of samples) are not under direct control of the individual responsible for them, they must be stored in a locked container sealed with a Chain of Custody seal.

The Chain of Custody record should include (at minimum) the following:

- 1. Sample identification number.
- 2. Sample information.
- 3. Sample location.
- 4. Sample date.
- 5. Sample description.

- 6. Laboratory analysis.
- 7. Laboratory name and address.
- 8. Name(s) and signature(s) of sampler(s).
- 9. Signature(s) of any individual(s) with control over the samples.

CHAIN OF CUSTODY SEALS

Chain of Custody Seals demonstrate that a sample container has not been tampered with, or opened. The individual in possession of the sample(s) must sign and date the seal, affixing it in such a manner that the container cannot be opened without breaking the seal. The name of this individual, along with a description of the sample packaging, must be noted in the Field Logbook.

The Chain of Custody Record is employed as physical evidence of sample custody. One Record accompanies each properly labelled and DOT-packaged sample shipping container from the field to the laboratory. In Region II, the Environmental Services Division Chain of Custody Record is used.

The DOT packaged shipping containers are secured and custody seals are placed across the package openings. As long as custody forms are sealed inside the sample cooler and the custody seals remain intact, commercial carriers and are not required to sign off on the custody form.

Samples split between two different laboratories must be correctly labeled with separate tags and sample identification stickers, provided by the laboratories.

If errors are made when completing any of these forms, the error must be crossed out with a single line, initiated and dated by the sampler.

4.3.2 Soil Sampling SOPs

Collection of surface soil samples will be accomplished with a disposable plastic scoop. Prior to the collection of the sample, surface debris will be removed with a decontaminated sampling tool.

A 12" X 12" square area will be marked out with a measuring tape at the sample location. The sample will be collected from a depth of 0 to 3 inches. The soil will be mixed thoroughly in place prior to transferring to the designated labeled container. See Attachment C for additional requirements for soil sampling procedures.

4.3.3 Sample Handling and Shipment

1 1 18

Each of the sample bottles will be sealed and labeled according to the following protocol. Caps will be secured with custody seals. Bottle labels will contain all required information including the sample number, time and date of collection, analysis requested, sample description and any preservative used. Sealed bottles will be placed in large metal or plastic coolers, padded with an absorbent material such as vermiculite and cooled to a temperature of 4 °C with ice.

All sample documents will be affixed to the underside of each cooler lid. The lid will be sealed and affixed on at least two sides with EPA custody seals so that any sign of tampering is easily visible.

4.4 Schedule of Activities

Table 3: Proposed Schedule of Work

ACTIVITY	START DATE	END DATE
Surface Soil Sampling	To Be Determined	To Be Determined

5.0 PROJECT ORGANIZATION AND RESPONSIBILITIES

The EPA On-Scene Coordinator, Irmee Huhn, will provide overall direction to Region II START staff concerning project sampling needs, objectives and schedule.

The Region II START Task Leader, Randy Komssi, is the primary point of contact with the EPA On-Scene Coordinator. The Task Leader is responsible for the development and completion of the Sampling QA/QC Plan, project team organization, and supervision of all project tasks, including reporting and deliverables.

The START Task Leader/Site QC Coordinator, Randy Komssi, is responsible for ensuring field adherence to the Sampling QA/QC Plan and recording any deviations.

The following sampling personnel will work on this project:

Personnel	Affiliation	Responsibility
Irmee Huhn Randy Komssi	USEPA Region II START II	On-Scene Coordinator Sample Collection

The following laboratory will be providing the following analyses:

Lab Name/Location

Lab Type

<u>Parameters</u>

To be Determined

6.0 QUALITY ASSURANCE and QUALITY CONTROL REQUIREMENTS

6.1 Chain of Custody

An EPA chain of custody record will be maintained throughout the sampling program. The chain of custody form lists the following information:

- i. Sample numbers;
- ii. Number of sample containers;
- iii. Description of sample, including the specific location of sample collection, sample matrix and grab or composite sample;
- iv. Identity of person collecting the sample;
- v. Date and time of sample collection;
- vi. Type of analysis requested;
- vii. Date and time of custody transfer to laboratory by sampling personnel;
- viii. Identity of laboratory performing the analyses.

6.2 Laboratory Analyses

The level of quality assurance/quality control (QA/QC) to be furnished by the contracted laboratory will be QA/QC level 2 (QA-2). In order to ensure accurate data, the following measures are required:

1. Mercury Analysis

- a. One matrix spike analysis will be performed on one sample in each set of 20 environmental samples collected.
- b. One duplicate sample analysis will performed on each set of 20 environmental samples collected.

2. All Analysis

The contracted laboratory will furnish the following deliverables as warranted:

- a. Calibration analysis prior to analyzing calibration solutions, blanks, samples and QC samples;
- b. Preparation, extraction and/or analysis dates;
- c. Bench sheets and/or sample extraction, digestion, or distillation logs for percent solids, sample weight and final volume;
- d. Copies of all spectra data obtained during performance of analysis. Copies should be signed by the analyst and checked by the laboratory manager;
- e. The detection limit will be determined and recorded, along with the data, where appropriate; detection limits must meet the specified limits.
- f. Data system printout (quantitation report or legible facsimile GC);
- g. Spike Matrix/Duplicate and Calibration Standard Sample Recoveries;
- h. Case Narrative identifying and explaining any analytical modifications that differ from EPA protocol.

All analytical results are to be submitted by the laboratory to the designated QA/QC Officer within 12 hours of sample receipt. A written report will be submitted within 7 calendar days of sample receipt.

7.0 DELIVERABLES

The Region II START Task Leader, Randy Komssi, will maintain contact with the EPA On-Scene Coordinator, Irmee Huhn, to keep her informed about the technical and financial progress of this project. Activities under this project will be reported in status and trip reports and other deliverables (e.g., analytical reports, final reports) described herein.

TRIP REPORT

A trip report will be prepared to provide a detailed accounting of what occurred during each sampling mobilization. The trip report will be prepared within two weeks of the last day of each sampling mobilization. Information will be provided in a timely basis for major events, dates, and personnel on site (including affiliations).

ANALYTICAL REPORT

An analytical report which describes methodologies used, details analytical results, and evaluates quality control information, will be prepared.

MAPS/FIGURES

The following illustration(s) will be provided:

Site Location Map Sample Location Map

8.0 DATA VALIDATION

All steps of data generation and handling will be evaluated by the Region II START Quality Assurance Officer (QAO) for compliance with the specified requirements. The QAO will provide the finalized assembled data package to the START Task Leader and the EPA OSC.

9.0 SYSTEM AUDIT

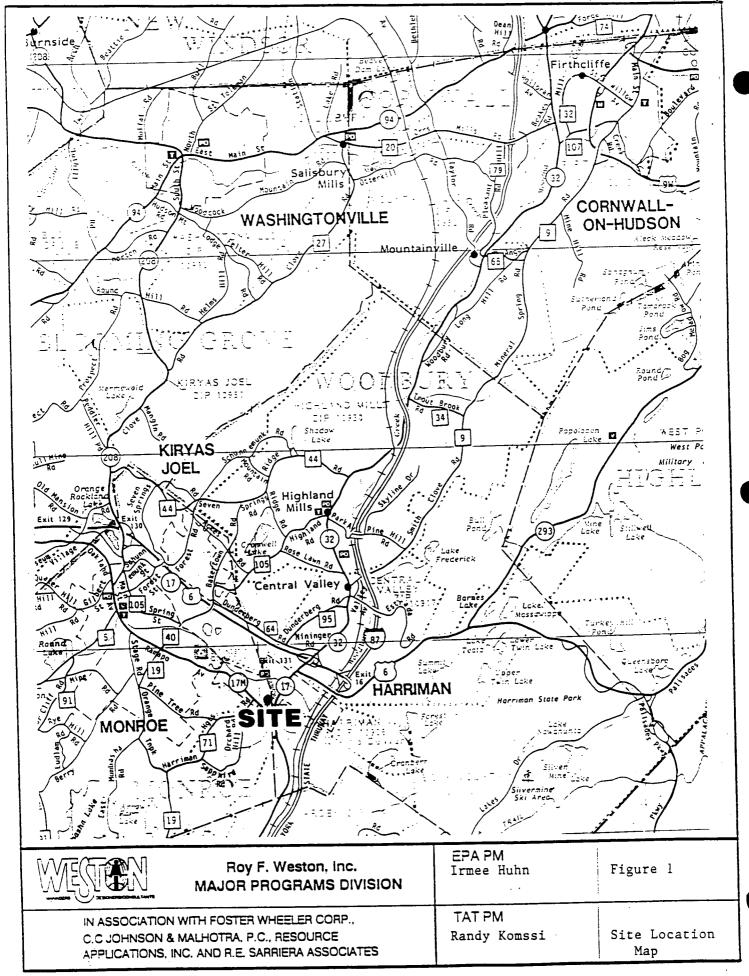
The Region II START Task Leader will ensure the sampling operations are conducted according to this sampling plan. Any deviations will be brought to the attention of the OSC and documented accordingly.

10.0 CORRECTIVE ACTIONS

Appropriate action will be taken by the Region II START Task Leader to ensure that any problems that may develop are dealt with as quickly as possible to ensure the continuity of the sampling program. Any deviations from this sampling plan will be noted in the final trip report.

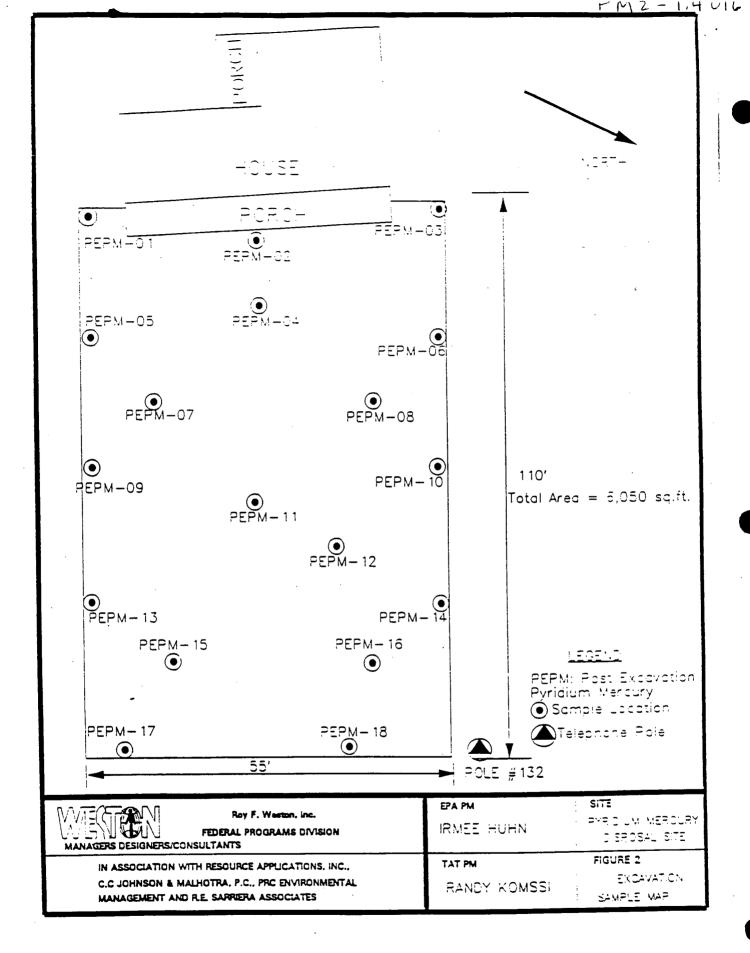
APPENDIX A

Pyridium Mercury Site No. 2
Site Location Map



APPENDIX B

Proposed Sampling Map



APPENDIX C
Soil Sampling SOP

2.0 SOIL SAMPLING: SOP #2012

2.1 SCOPE AND APPLICATION

The purpose of this Standard Operating Procedure (SOP) is to describe the procedures for collecting representative soil samples. Analysis of soil samples may determine whether concentrations of specific sod pollutants exceed established action levels, or if the concentrations of soil pollutants present a risk to public health, welfare, or the environment.

2.2 METHOD SUMMARY

Soil samples may be collected using a variety of methods and equipment. The methods and equipment used are dependent on the depth of the desired sample, the type of sample required (disturbed versus undisturbed), and the type of soil. Near-surface soils may be easily sampled using a spade, trowel, and scoop. Sampling at greater depths may be performed using a hand auger, a trier, a split-spoon, or, if required, a backhoe.

2.3 SAMPLE PRESERVATION, CONTAINERS, HANDLING, AND STORAGE

Chemical preservation of solids is not generally recommended. Refrigeration to 4°C, supplemented by a minimal holding time, is usually the best approach.

2.4 INTERFERENCES AND POTENTIAL PROBLEMS

There are two primary interferences or potential problems associated with soil sampling. These include cross-contamination of samples and improper sample collection. Cross-contamination problems can be eliminated or minimized through the use of dedicated sampling equipment. If this is not possible or practical, then decontamination of sampling equipment is necessary. Improper sample collection can involve using contaminated equipment, disturbance of the matrix resulting in compaction of the sample, or inadequate homogenization of the samples where required, resulting in variable, non-representative results.

2.5 EQUIPMENT/APPARATUS

- sampling plan
- maps/plot plan

- safety equipment, as specified in the health and safety plan
- compass
- tape measure
- survey stakes or flags
- camera and film
- stainless steel, plastic, or other appropriate homogenization bucket or bowl
- 1-quart mason jars w/Teflon liners
- Ziploc plastic bags
- logbook
- labels
- chain of custody forms and seals
- field data sheets
- cooler(s)
- ice
- decontamination supplies/equipment
- canvas or plastic sheet
- spade or shovel
- spatula
- scoop
- plastic or stainless steel spoons
- trowel
- continuous flight (screw) auger
- bucket auger
- post hole auger

- extension rods
- T-handle
- sampling trier
- thin-wall tube sampler
- Vehimeyer soil sampler outfit
 - tubes
 - points
 - drive head
 - drop hammer
 - puller jack and grip
- backhoe

2.6 REAGENTS

Reagents are not used for the preservation of soil samples. Decontamination solutions are specified in ERT SOP #2006, Sampling Equipment Decontamination.

2.7 PROCEDURES

2.7.1 Preparation

- 1. Determine the extent of the sampling effort, the sampling methods to be employed, and which equipment and supplies are required.
- Obtain necessary sampling and monitoring equipment.
- Decontaminate or preclean equipment, and ensure that it is in working order.
- 4. Prepare schedules, and coordinate with staff, client, and regulatory agencies, if appropriate.
- 5. Perform a general site survey prior to site entry in accordance with the site-specific health and safety plan.
- 6. Use stakes, buoys, or flagging to identify and mark all sampling locations. Consider specific site

factors, including extent and nature of contaminant, when selecting sample location. If required, the proposed locations may be adjusted based on site access, property boundaries, and surface obstructions. All staked locations will be utility-cleared by the property owner prior to soil sampling.

2.7.2 Sample Collection

Surface Soil Samples

Collect samples from near-surface soil with tools such as spades, shovels, and scoops. Surface material can be removed to the required depth with this equipment, then a stainless steel or plastic scoop can be used to collect the sample.

This method can be used in most soil types but is limited to sampling near surface areas. Accurate, representative samples can be collected with this procedure depending on the care and precision demonstrated by the sampling team member. The use of a flat, pointed mason trowel to cut a block of the desired soil can be helpful when undisturbed profiles are required. A stainless steel scoop, lab spoon, or plastic spoon will suffice in most other applications. Avoid the use of devices plated with chrome or other materials. Plating is particularly common with garden implements such as potting trowels.

Follow these procedures to collect surface soil samples.

- 1. Carefully remove the top layer of soil or debris to the desired sample depth with a pre-cleaned spade.
- Using a pre-cleaned, stainless steel scoop, plastic spoon, or trowel, remove and discard a thin layer of soil from the area which came in contact with the spade.
- 3. If volatile organic analysis is to be performed, transfer a portion of the sample directly into an appropriate, labeled sample container(s) with a

stainless steel lab spoon, plastic lab spoon, or equivalent and secure the cap(s) tightly. Place the remainder of the sample into a stainless steel. plastic, or other appropriate homogenization container, and mix thoroughly to obtain a homogenous sample representative of the entire sampling interval. Then, either place the sample into appropriate, labeled container(s) and secure the cap(s) tightly; or, if composite samples are to be collected, place a sample from another sampling interval into the homogenization container and mix thoroughly. When compositing is complete, place the sample into appropriate, labeled container(s) and secure the cap(s) tightly.

Sampling at Depth with Augers and Thin-Wall Tube Samplers

· 一种,在我们们会通过。

This system consists of an auger, a series of extensions, a "T" handle, and a thin-wall tube sampler (Appendix A, Figure 1). The auger is used to bore a hole to a desired sampling depth, and is then withdrawn. The sample may be collected directly from the auger. If a core sample is to be collected, the auger tip is then replaced with a thin-wall tube sampler. The system is then lowered down the borehole, and driven into the soil at the completion depth. The system is withdrawn and the core collected from the thin-wall tube sampler.

Several types of augers are available. These include: bucket, continuous flight (screw), and posthole augers. Bucket augers are better for direct sample recovery since they provide a large volume of sample in a short time. When continuous flight augers are used, the sample can be collected directly from the flights, which are usually at 5-feet intervals. The continuous flight augers are satisfactory for use when a composite of the complete soil column is desired. Posthole augers have limited utility for sample collection as they are designed to cut through fibrous, rooted, swampy soil.

Follow these procedures for collecting soil samples with the auger and a thin-wall tube sampler.

- 1. Attach the auger bit to a drill rod extension, and attach the 'Thankle to the drill rod.
- 2. Clear the area to be sampled of any surface debris (e.g., twigs, rocks, litter). It may be advisable to remove the first 3 to 6 inches of surface soil for an area approximately 6 inches in radius around the drilling location.
- 3. augering. periodically Begin removing and depositing accumulated soils onto a plastic sheet spread near the hole. This prevents accidental brushing of loose material back down the borehole when removing the auger or adding drill rods. It also facilitates refilling the hole, and avoids possible contamination of the surrounding area.
- 4. After reaching the desired depth, slowly and carefully remove the auger from boring. When sampling directly from the auger, collect sample after the auger is removed from boring and proceed to Step 10.
- 5. Remove auger tip from drill rods and replace with a pre-cleaned thin-wall tube sampler. Install proper cutting tip.
- 6. Carefully lower the tube sampler down the borehole. Gradually force the tube sampler into the soil. Care should be taken to avoid scraping the borehole sides. Avoid hammering the drill rods to facilitate coring as the vibrations may cause the boring walls to collapse.
- 7. Remove the tube sampler, and unscrew the drill rods.
- 8. Remove the cutting tip and the core from the device.

- 9. Discard the top of the core (approximately 1 inch), as this represents material collected before penetration of the layer of concern. Place the remaining core into the appropriate labeled sample container(s). Sample homogenization is not required.
- 10. If volatile organic analysis is to be performed, transfer a portion of the sample directly into an appropriate, labeled sample container(s) with a stainless steel lab spoon, plastic lab spoon, or equivalent and secure the cap(s) tightly. Place the remainder of the sample into a stainless steel, plastic, or other appropriate homogenization container, and mix thoroughly to obtain a homogenous sample representative of the entire sampling interval. Then, either place the sample into appropriate, labeled container(s) and secure the cap(s) tightly; or, if composite samples are to be collected, place a sample from another sampling interval into the homogenization container and mix thoroughly. When compositing is complete, place the sample into the appropriate, labeled container(s) and secure the cap(s) tightly.
- 11. If another sample is to be collected in the same hole, but at a greater depth, reattach the auger bit to the drill and assembly, and follow steps 3 through 11, making sure to decontaminate the auger and tube sampler between samples.
- 12. Abandon the hole according to applicable state regulations. Generally, shallow holes can simply be backfilled with the removed soil material.

Sampling at Depth with a Trier

The system consists of a trier, and a "T" handle. The auger is driven into the soil to be sampled and used to extract a core sample from the appropriate depth.

Follow these procedures to collect soil samples with a sampling trier:

- Insert the trier (Appendix A, Figure
 into the material to be sampled at a (0° to 45° angle from horizontal. This orientation minimizes the spillage of sample.
- 2. Rotate the trier once or twice to cut a core of material.
- 3. Slowly withdraw the trier, making sure that the slot is facing upward.
- 4. If volatile organic analysis is to be performed, transfer a portion of the sample directly into an appropriate, labeled sample container(s) with a stainless steel lab spoon, plastic lab spoon, or equivalent and secure the cap(s) tightly. Place the remainder of the sample into a stainless steel. plastic, or other appropriate homogenization container, and mix thoroughly to obtain a homogenous sample representative of the entire sampling interval. Then, either place the sample into an appropriate, labeled container(s) and secure the cap(s) tightly; or, if composite samples are to be collected, place a sample from another sampling interval into the homogenization container and mix thoroughly. When compositing is complete, place the sample into an appropriate, labeled container(s) and secure the cap(s) tightly.

Sampling at Depth with a Split Spoon (Barrel) Sampler

The procedure for split spoon sampling describes the collection and extraction of undisturbed soil cores of 18 or 24 inches in length. A series of consecutive cores may be extracted with a split spoon sampler to give a complete soil column profile, or an auger may

be used to drill down to the desired depth for sampling. The split spoon is then driven to its sampling depth through the bottom of the augured hole and the core extracted.

When split tube sampling is performed to gain geologic information, all work should be performed in accordance with ASTM D 1586-67 (reapproved 1974).

Follow these procedures for collecting soil samples with a split spoon.

- 1. Assemble the sampler by aligning both sides of the barrel and then screwing the bit onto the bottom and the heavier head piece onto the top.
- Place the sampler in a perpendicular position on the sample material.
- 3. Using a sledge hammer or well ring, if available, drive the tube.

 Do not drive past the bottom of the head piece or compression of the sample will result.
- 4. Record in the site logbook or on field data sheets the length of the tube used to penetrate the material being sampled, and the number of blows required to obtain this depth.
- 5. Withdraw the sampler, and open by unscrewing the bit and head and splitting the barrel. If a split sample is desired, a cleaned, stainless steel knife should be used to divide the tube contents in half, longitudinally. This sampler is typically available in diameters of 2 and 3 1/2 inches. However, in order to obtain the required sample volume, use of a larger barrel may be required.
- 6. Without disturbing the core, transfer it to an appropriate labeled sample container(s) and seal tightly.

Test Pit/Trench Excavation

These relatively large excavations are used to remove sections of soil, when detailed examination of soil characteristics (horizontal structure, color, etc.) are required. It is the least cost effective sampling method due to the relatively high cost of backhoe operation.

Follow these procedures for collecting soil samples from test pit/trench excavations.

- 1. Prior to any excavation with a backhoe, it is important to ensure that all sampling locations are clear of utility fines and poles (subsurface as well as above surface).
- 2. Using the backhoe, dig a trench to approximately 3 feet in width and approximately 1 foot below the cleared sampling location. Place removed or excavated soils on plastic sheets. Trenches greater than 5 feet deep must be sloped or protected by a shoring system, as required by OSHA regulations.
- 3. Use a shovel to remove a 1- to 2-inch layer of soil from the vertical face of the pit where sampling is to be done.
- 4. Take samples using a trowel, scoop, or coring device at the desired intervals. Be sure to scrape the vertical face at the point of sampling to remove any soil that may have fallen from above, and to expose fresh soil for sampling. In many instances, samples can be collected directly from the backhoe bucket.
- 5. If volatile organic analysis is to be performed, transfer a portion of the sample directly into an appropriate, labeled sample container(s) with a stainless steel lab spoon, plastic lab spoon, or equivalent and secure the cap(s) tightly. Place the remainder

of the sample into a stainless steel, plastic, or other appropriate homogenization container, and mix thoroughly to obtain a homogenous sample representative of the entire sampling interval. Then, either place the sample into appropriate, labeled container(s) and secure the cap(s) tightly; or, if composite samples are to be collected, place a sample from another sampling interval into the homogenization container and mix thoroughly. When compositing is complete, place the sample into appropriate, labeled container(s) and secure the cap(s) tightly.

6. Abandon the pit or excavation according to applicable state regulations. Generally, shallow excavations can simply be backfilled with the removed soil material.

2.8 CALCULATIONS

This section is not applicable to this SOP.

2.9 QUALITY ASSURANCE/ QUALITY CONTROL

There are no specific quality assurance activities which apply to the implementation of these procedures. However, the following QA procedures apply:

- All data must be documented on field data sheets or within site logbooks.
- All instrumentation must be operated in accordance with operating instructions as supplied by the manufacturer, unless otherwise specified in the work plan. Equipment checkout and calibration activities must occur prior t o sampling/operation, and they must be documented.

2.10 DATA VALIDATION

This section is not applicable to this SOP.

2.11 HEALTH AND SAFETY

When working with potentially hazardous materials, follow U.S. EPA, OSHA, and specific health and safety procedures.

SAMPLING TRIP REPORT

SITE NAME:

Pyridium Mercury Disposal Site No. 2

DCN: START-02-F-00100

TDD #: 95-10-0035

PCS #: 1076

EPA I.D. NO.:

ΕZ

SAMPLING DATES:

12/4/95 through 12/14/95

1. Site Location Map:

Refer to Figure 1

2. Sample Locations:

Refer to Figure 2

3. Sample Descriptions:

Refer to Table 1

4. Laboratories Receiving Samples:

Matrix

Name and Address of Laboratory

Soil

Adirondack Environmental Services

314 North Pearl St. Albany, NY 12207

5. Sample Dispatch Data:

The following details sample collection at the site during this month:

DATE	TIME	# of SAMPLES	SAMPLE TYPE	ANALYSIS
December 4, 1995	1315	1	Tree Bark	Total Mercury
December 8, 1995	1400	9	Soil	Total Mercury
December 8, 1995	1630	2	Debris	Total Mercury
December 13, 1995	1630	15	Soil	Total Mercury
December 14, 1995	1625	3	Soil	Total Mercury

All samples delivered to laboratory by Leadfoot Carriers.

6. On-Site Personnel:

NameAffiliationResponsibilities on SiteRandy KomssiRegion II STARTProject Manager/SamplerIrmee HuhnRegion II EPAOn-Scene CoordinatorTracy WalkerRegion II ERCSResponse Manager

7. Weather Conditions:

For the duration of the sampling event, the temperature ranged between 15 to 40° F. Cold conditions generated a frost line beneath the surface at approximately 0 - 4" thick. From December 14, 1995 and on, there was approximately 4 to 6" of snow on the ground.

8. Additional Comments:

Due to subfreezing temperatures and the depth of the frost line, perimeter samples, which were designated to be taken at a depth of 0 - 3" were obtained below the frost line. A total of 24 soil samples were collected, which included three field samples for duplicates analysis. In addition, three matrix spike/matrix spike duplicate (MS/MSD) samples were collected to meet EPA QA/QC Level 2 objectives. All samples were collected using 4 oz. disposable plastic scoops and placed in clear 8 oz. jars.

9. Report Prepared by: Randy Komssi Date: 12/27/95

10. Report Reviewed by: Date: 4/18/94

11. Report Approved by: lime the Date: 4/26/96

TABLE 1 SAMPLE DESCRIPTIONS PYRIDIUM MERCURY DISPOSAL SITE No. 2 HARRIMAN, NEW YORK

SAMPLING DATES: 12/4/95 TO 12/14/95

SAMPLE NUMBER	DATE	TIME	MATRIX	SAMPLE TYPE	ANALYSIS	SAMPLE DEPTH	LOCATION AND DESCRIPTION
T-01	12/4/95	1201	bark, wood chips	grab	mercury	NA	weeping willow tree
D-01	12/7/95	1600	soil/debris	grab	mercury	2-2'3"	see map for location cement-like debris
D-02	12/7/95	1605	soil/debris	grab	mercury	2-2'3"	see map for location cement-like debris
PE-01-A	12/8/95	1235	soil	grab	mercury	0-3"	south wall/ brown/silty
PE -01- B	12/8/95	1240	soil	grab	mercury	8"-1'	south wall/ brown/silty
PE-02-A	12/8/95	1245	soil	grab	mercury	0-3"	in front of house/ brown/silty
PE-02-B	12/8/95	1247	soil	grab	mercury	1'10"-2'	in front of house/ brown/silty
PE-03-A*	12/8/95	1245	soil	grab	mercury	0-3"	northwest corner/ brown/silty
PE-03-B	12/8/95	1247	soil	grab	mercury	2'-2'3"	northwest corner/ light brown/clay
PE-04-A	12/8/95	1249	soil	grab	mercury	0-3"	northwest wall/ brown/silty
PE-04-B	12/8/95	1250	soil	grab	mercury	1'10"-2'	northwest wall/ light brown/clay
PE-05-B**	12/8/95	1330	soil	grab	mercury	2'-2'3"	northwest corner/ light brown/clay Dupe of PE-03-B
PE-06-A *	12/13/95	0945	soil	grab	mercury	0-3"	northwest wall/ brown/silty-loam
PE-06-B	12/13/95	1000	soil	grab	mercury	1'3"-1'6"	northwest wall/ brown/silty
PE-07-A	12/13/95	1020	soil	grab	mercury	2-6"	north corner/ light brown/frozen
PE-08-A	12/13/95	1045	soil	grab	mercury	6-10"	northeast corner/ light brown/frozen
PE-09-A**	12/13/95	1100	soil	grab	mercury	0-3*	northwest wall/ brown/silty-loam Dupe of PE-06-A
PE -10	12/13/95	1335	soil	grab	mercury	2'6"-2'9"†	see map for location frozen/some debris
PE-11	12/13/95	1400	soil	grab	mercury	2'-2'3"†	see map for location frozen/some debris

^{*} MS/MSD Sample - Indicates that extra sample volume was collected and shipped to the laboratory for MS/MSD analysis.

^{**} Field duplicate sample.

[†] Bottom excavation sample

TABLE 1 SAMPLE DESCRIPTIONS PYRIDIUM MERCURY DISPOSAL SITE No. 2 HARRIMAN, NEW YORK

SAMPLING DATES: 12/4/95 TO 12/14/95

SAMPLE NUMBER	DATE	TIME	MATRIX	SAMPLE TYPE	ANALYSIS	SAMPLE DEPTH	LOCATION AND DESCRIPTION
PE-12	12/13/95	1330	soil	grab	mercury	3'-3'3"†	see map for location frozen/some debris
PE-13	12/13/95	1200	soil	grab	mercury	1'6"-1'9"†	see map for location frozen/some debris
PE-14	12/13/95	1405	soil	grab	mercury	1'6"-1'9"†	see map for location frozen/some debris
PE-15	12/13/95	1400	soil	grab	mercury	1'-1'3"†	see map for location brown/frozen clay
PE-16-A	12/13/95	1425	soil	grab	mercury	9"-1'	northeast corner/ light brown/frozen
PE-17	12/13/95	1410	soil	grab	mercury	4'-4'4"†	see map for location brown/some debris
PE-18	12/13/95	1420	soil	grab	mercury	3'-3'3"†	see map for location brown/some debris
PE-19-A	12/13/95	1425	soil	grab	mercury	4-8"	southeast corner/ brown/frozen
PE-20-A*	12/14/95	1330	soil	grab	mercury	4-8"	northeast wall/ black/silty
PE-21-A**	12/14/95	1340	soil	grab	mercury	4-8"	northeast wall/ black/silty Dupe of PE-20-A
PE-22-A	12/14/95	1540	soil	grab	mercury	0-3"	northwest wall/ black/silty-loam

^{*} MS/MSD Sample - Indicates that extra sample volume was collected and shipped to the laboratory for MS/MSD analysis

^{**} Field duplicate sample

[†] Bottom excavation sample

FIGURE 1 SITE LOCATION MAP

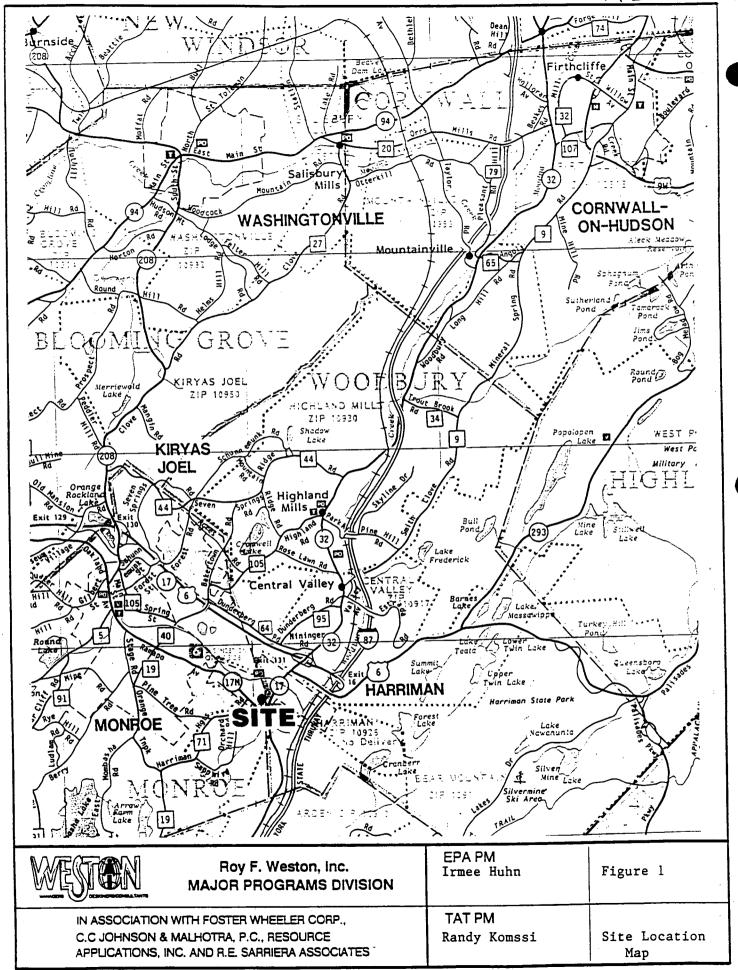
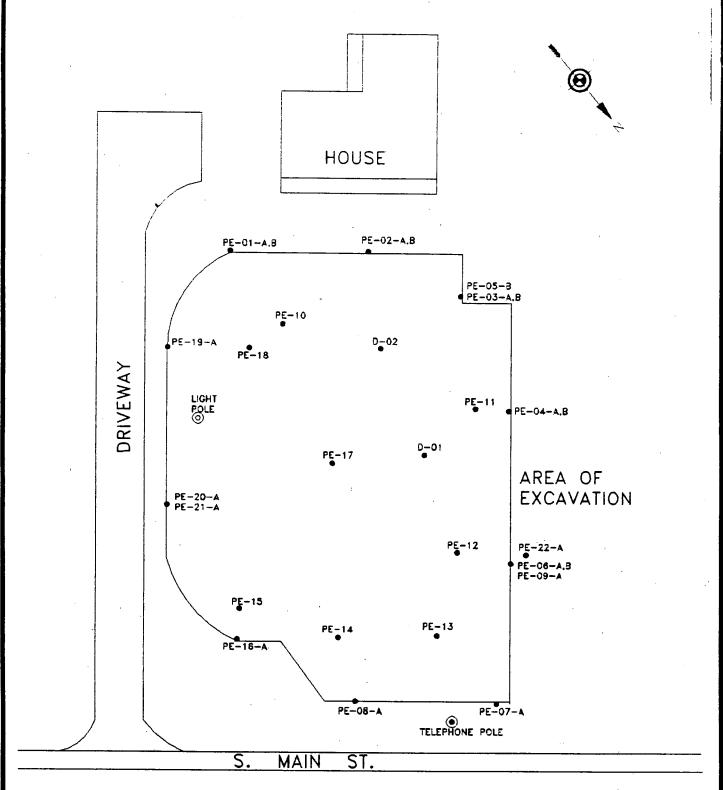


FIGURE 2 SAMPLE LOCATION MAP



SCALE: 1"	= 20'
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Roy F. Weston, Inc. FEDERAL PROGRAMS DIVISION	I. HUHN	PYRIDIUM MERCURY
IN ASSOCIATION WITH RESOURCE APPLICATION, Inc. C.C. JOHNSON & MALHOTRA, P.C., R.E. SARRIERA ASSOCIATES, PRC ENVIRONMENTAL MANAGEMENT, AND GRB ENVIRONMENTAL SERVICES, INC.	START PM R. KOMSSI .	SITE II

SAMPLING REPORT EXTENT OF CONTAMINATION STUDY

PYRIDIUM MERCURY DISPOSAL SITE NO. 2 VILLAGE OF HARRIMAN ORANGE COUNTY, NEW YORK

JUNE 1996

Prepared by:

U.S. Environmental Protection Agency Region II Removal Action Branch Eric Wilson, On-Scene Coordinator

Roy F. Weston, Inc.
Superfund Technical Assessment and Response Team
Kathy Campbell, Project Manager

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1. INTRODUCTION

1.1 Site Background

The Pyridium Mercury Disposal Site No. 2 is a residential property located at the west corner of the intersection of Ramapo Lane and South Main Street in the Village of Harriman, Orange County, New York.

The U.S. Environmental Protection Agency (EPA) was notified by the New York State Department of Health and the Village of Harriman that material similar to that found at the Pyridium Mercury Disposal Site No.1 was present at this property.

In October 1994, the Roy F. Weston Technical Assistance Team (TAT) conducted a study to quantify the concentration of mercury in surface soils at the site. The results of this study are included as Appendix A. This study concluded that:

- 1. The white solid found on site is similar in appearance and contains similar quantities of mercury as the waste found at the Pyridium Mercury Disposal Site No. 1; and
- 2. Mercury contamination is widespread in surface soils in the front yard of the residence located on site.

1.2 Sampling Objective

The EPA Region II On-Scene Coordinator (OSC) tasked TAT with conducting a study to determine the vertical and horizontal extent of mercury contamination at the Site.

2. METHODOLOGY

2.1 Sampling Summary

The EPA Environmental Response Team (ERT) and the Response Engineering and Analytical Contractor (REAC) assisted in the study by providing personnel and equipment for collection of subsurface soil samples. TAT provided personnel, equipment and resources for documentation of the sampling event and analysis of samples.

The sampling was conducted on December 7, 1994. Eleven soil borings were advanced to a maximum depth of 12 feet using a Geoprobe®. A total of ten samples were screened for the presence of mercury using an X-Ray Fluorescence Analyzer (XRF).

2.2 Soil Borings and Sampling

Soil borehole locations were selected based on the results of the sampling conducted in October 1994.

Soil sampling was conducted in accordance with the Soil Sampling SOP #2012 (Appendix B). Soil samples were collected using 2-inch diameter split spoons, lined with acetate sleeves. The acetate sleeves were used to facilitate sample recovery and reduce the potential for cross-contamination of samples. The split spoons were advanced and recovered using a truck-mounted hydraulic ram (Geoprobe®). The soils at each borehole location were described by the Project Geologist. These borehole logs are included in Appendix C.

2.3 XRF Field Screening for Metals

Samples of soils directly underlying layers containing visible waste were selected for XRF screening to delineate the vertical extent of mercury contamination. Sample preparation and XRF analysis were conducted in accordance with USEPA ERT/REAC Spectrace 9000 XRF SOP (Appendix D).

Samples were homogenized, dried, and sifted using a #20 mesh sieve, and placed in sample cups. Samples were screened for metals using a Spectrace Model 9000 XRF. Source measuring times used for analysis were 1000 seconds for the Cadmium 109 (Cd109), 10 seconds for Iron 55 (Fe55), and 10 seconds for Americium 241 (Am241). The measuring time for the Cd109 source was maximized in order to minimize the detection limit for mercury. The elements detected using the Fe55 and Am241 sources were not required for this investigation. The measuring times for these sources were minimized to reduce the time required for analysis.

Results for all 26 elements analyzed were stored in the instrument's internal memory; this data was downloaded to a computer data file for further processing. The downloaded data is presented in Appendix E. Instrument calibration and mercury results were also recorded in the instrument log book. The logbook entries are presented in Appendix F.

3. RESULTS

3.1 XRF Results

The results of XRF analysis and sample descriptions are presented in Table 1. The mercury concentrations in all samples analyzed were

determined to be less than the instrument Method Detection Limit (MDL). The MDL and Method Quantitation Limit (MQL) for this sampling event were calculated to be 24 and 80 milligrams per kilogram (mg/kg), respectively (Table 2).

4. DISCUSSION OF RESULTS

4.1 Extent of Mercury Contamination

Waste was observed in borings A1, B17B1A, B2, C1, C2 and C3. Thin lenses of waste were found intermixed with fill consisting of brown silt, sand, and coal, rock and brick fragments. The fill unit extends from the ground surface to a depth of 5.4 feet below ground surface at boring B2. Waste was observed from 0 to 1.5 feet below ground surface. Samples collected from soils underlying the mercury contaminated material were screened for mercury using the XRF. The mercury concentrations in all screened samples were determined to be less than the instrument MDL. No waste was observed in borings A2, A3, B3, D1 and D2. Cross sections of sample lines A, B, C & D are included as Appendix G.

The horizontal extent of mercury contamination is bounded on the north by the property line; on the east by boring A3 and South Main Street; on the south by borings D1 and D2; and on the west by surface soil samples N10W50 and N50W50 (Figures 1 & 2).

5. CONCLUSIONS

Mercury-contaminated material was used to fill low-lying areas of the property. Thin layers of the material were observed intermixed with fill in the northeast property corner. Based on the results of the sampling conducted during this study, the mercury contamination appears to be limited to the top two feet of soils. The area of mercury contamination encompasses approximately 6,600 square feet. The volume of mercury contaminated soil is estimated to be 500 cubic yards. Calculations of the area of contamination and volume of contaminated soil are included as Appendix H.

TABLES

TABLE 1
Results of XRF Screening for Mercury
Sampling Conducted December 7, 1994

	T	T		
Sample Number	Boring Location	Sample Depth (feet)	Mercury Conc. (mg/kg)	Sample Description
A1 1.5-2.0'	A1	1.5-2.0	ND1	Brown coarse to medium sand and silt, trace fine sand and rock fragments present, loose compaction, dry.
A2 0-1.5'	A2	0-1:5	ND	Brown course to medium sand and silt, trace fine sand and silt, trace fine sand and rock fragments present, loose compaction, dry.
A3 1.5-2.0'	A3	1.5-2.0	ND	Fill material, large gravel and rock fragments, little coarse to medium sand, poor sorting, loose compaction, moist.
B1 1.5-3.0'	B1	1.5-3.0'	ND	Fill material, gravel, brown silt and sand, loose compaction dry. Sample collected below product lens.
B2 1-5-2.0'	B2	1.5-2.0'	ND	Mottled fill containing coal, gravel and silt. Sample collected below product lens.
B3 1.0-2.0'	B3	1.0-2.0'	ND	Mottled fill, gravel, course to medium sand, rock fragments, loose compaction, dry.
C1 3.0-5.0'	C1	3.0-5.0	ND	Mottled fill, coal, gravel, rocks and white flakes present; loose compaction, dry.
C3 1.0-1.5'	C3	1.0-1.5'	ND	Fill material, silt, gravel, fine sand, rock fragments, lenses and flakes of white product present, loose compaction, dry. Sample collected from below product lens.
D1 2.0'	D1	2.0	ND	Yellow brown silt and fine sand, subrounded rock fragments present, moist.
D2 2.0-2.6'	D2	2.0-2.6'	ND	Yellow brown silt and fine sand, gravel and rock fragments present, moderate compaction, moist.

¹ ND indicates that the analyte was not detected above the instrument detection limit of 24 mg/kg.

TABLE 2
Results of XRF Analysis of NIST Standard 2709
and Calculation of MDL and MQL

Sample Number	Analysis Date	· Analysis Time	Measured Mercury Concentration (mg/kg)		
NIST 2709 ²	12/6/94	13.87	-17.1		
NIST 2709	12/6/94	15.10	-26.7		
NIST 2709	12/6/94	17.96	-21.1		
NIST 2709	12/7/94	9.18	-11.5		
NIST 2709	12/7/94	9.51	-18.3		
NIST 2709	12/7/94	11.69	-35.6		
NIST 2709	12/7/94	12.06	-12.6		
NIST 2709	12/7/94	14.47	-23.3		

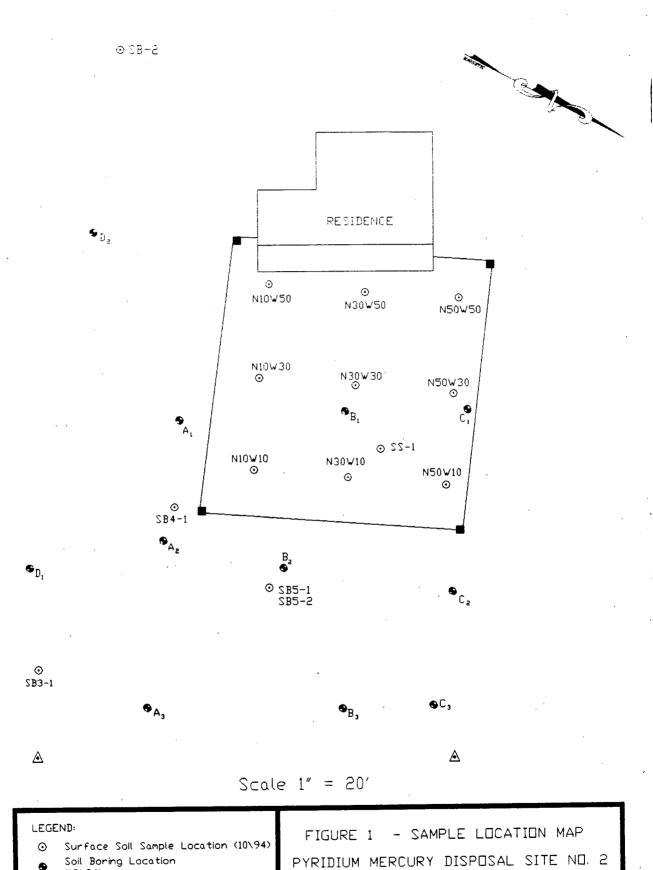
Population Standard Deviation = $O_{n-1} = [(x_i^2 - (x_i)^2/n)/(n-1)] \frac{1}{2} = 8$

Method Detection Limit = $3[O_{n-1}] = 24$

Method Quantitation Limit = $10[O_{n-1}] = 80$

²The NIST Certificate of Analysis for Standard Reference Material 2709 is included as Appendix I.

FIGURES



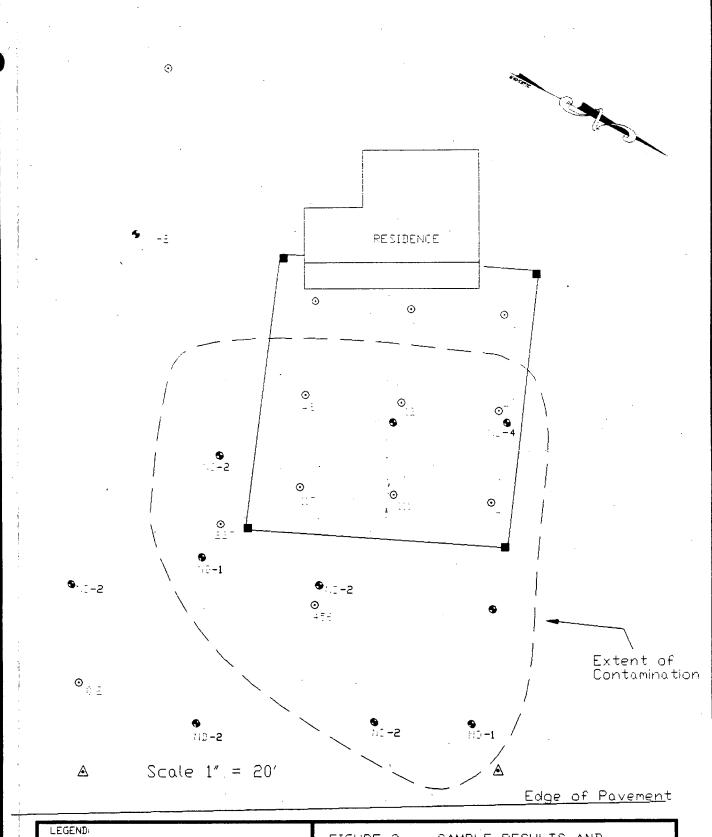
Surface Soll Sample Location (10\94)
Soil Boring Location
(12\94)
A Utility Pole
Fence Corner Post
Fence Line

FIGURE 1 - SAMPLE LOCATION MAP

PYRIDIUM MERCURY DISPOSAL SITE NO. 2

HARRIMAN, NEW YORK

OCTOBER & DECEMBER 1994



Surface Soll Sample Location Mercury Concentration (mg/kg) Soil Boring Location

Soil Boring Location

[E-1] Mercury Concentration (mg/kg) - Depth (ft)

A Utility Pole

Fence Corner Post Limit of Contamination FIGURE 2 - SAMPLE RESULTS AND EXTENT OF CONTAMINATION

PYRIDIUM MERCURY DISPOSAL SITE NO. 2

HARRIMAN, NEW YORK

OCTOBER & DECEMBER 1994

APPENDIX A RESULTS OF SOIL SAMPLING - OCTOBER 1994

Table A1 Soil Boring/Sample Description Pyridium Mercury Disposal Site No. 2 - Harriman NY October 1994

Boring ID	Description
SS-1	0-1 inch, topsoil mixed with white particulate.
	Grab soil sample SS-1 collected 0-1 inch below ground surface.
Boring #1	Boring advanced to 18 inches below grade. No waste observed.
	No sample collected.
Boring #2	Boring advanced to 14 inches below grade. No waste observed.
	Grab soil sample SB2-1 collected from 0-3 inches below ground surface.
Boring #3	Boring advanced to 12 inches below grade. No waste observed.
	Grab soil sample SB3-1 collected from 0-3 inches below ground surface.
Boring #4	Boring advanced to 18 inches below grade. Waste observed from 3-18 inches.
	Grab waste sample SB4-1 collected at a depth of 3-6 inches below grade.
Boring #5	Boring advanced to 12 inches below grade. Waste observed from 1-12 inches, lower limit of waste not found.
	Grab waste sample SB5-1 and duplicate SB5-2 collected 1 to 6 inches below grade.
N10W10	Boring advanced to 36 inches below grade. 0-9 inches - topsoil. 9-24 inches - white pasty solid. 24-36 inches - soil mixed with small stone.
	Grab soil sample N10W10 collected 0-3 inches below ground surface.

Table A1 Soil Boring/Sample Description Pyridium Mercury Disposal Site No. 2 - Harriman NY October 1994

Boring ID	Description
N10W30	Boring advanced to 18 inches below grade. 0-14 inches - topsoil. 14-13 inches - white pasty solid.
	Grab soil sample N10W30 collected 0-3 inches below ground surface.
N10W50	Boring advanced to 20 inches below grade. 0-20 inches - topsoil mixed with white granular material (similar to soil extender).
	Grab soil sample N10W50 collected 0-3 inches below ground surface.
N30W10	Boring advanced to a minimum of 6 inches below ground surface. 0-6 inches - topsoil. Waste encountered at 6 inches below ground surface.
	Grab soil sample N30W10 collected 0-3 inches below ground surface.
N30W30	Boring advanced to 22 inches below ground surface. 0-10 inches - topsoil. 10-18 inches - white pasty solid mixed with black ash. 18-22 inches - soil mixed with construction
	debris. Grab soil sample N30W30 collected 0-3 inches below ground surface.
N30W50	Boring advanced to 26 inches below ground surface. 0-6 inches - topsoil mixed with wood chips. No waste observed.
	Grab soil sample N30W50 collected 0-3 inches below ground surface.
N50W10	Boring advanced to 18 inches below ground surface. 0-18 inches - topsoil. No waste observed.
·	Grab soil sample N50W10 collected 0-3 inches below ground surface.

Table Al Soil Boring/Sample Description Pyridium Mercury Disposal Site No. 2 - Harriman NY October 1994

Boring ID	Description
N50W30	Boring advanced to 18 inches below ground surface. 0-12 inches - topsoil. 12-18 inches - white pasty solid mixed with debris.
	Grab soil sample N50W30 collected 0-3 inches below ground surface.
N50W50	Boring advanced to 18 inches below ground surface. 0-18 inches - topsoil mixed with rocks.
	Grab soil sample N50W50 and duplicate N50W50-A collected at 0-3 inches below ground surface.

Table A2
Results of Analysis
Pyridium Mercury Disposal Site No. 2 - Harriman NY
October 1994

Sample ID	Mercury Concentration (mg/kg)
SS-1	27.5
SB2-1	0.14
SB3-1	0.16
SB4-1	227
SB5-1	434
SB5-2	477
N10W10	117
N10W30	41.5
N10W50	1.0
N30W10	111
N30W30	11.9
N30W50	2.1
N50W10	7.2
N50W30	23.4
N50W50	0.06B
N50W50-A	0.06B

B - Indicates sample was detected at a concentration greater than the method detection limit and less than the method quantitation limit. Concentrations are estimates.

APPENDIX B
SOIL SAMPLING SOP #2012

2.0 SOIL SAMPLING: SOP #2012

2.1 SCOPE AND APPLICATION

The purpose of this Standard Operating Procedure (SOP) is to describe the procedures for collecting representative soil samples. Analysis of soil samples may determine whether concentrations of specific sod pollutants exceed established action levels, or if the concentrations of soil pollutants present a risk to public health, welfare, or the environment.

2.2 METHOD SUMMARY

Soil samples may be collected using a variety of methods and equipment. The methods and equipment used are dependent on the depth of the desired sample, the type of sample required (disturbed versus undisturbed), and the type of soil. Near-surface soils may be easily sampled using a spade, trowel, and scoop. Sampling at greater depths may be performed using a hand auger, a trier, a split-spoon, or, if required, a backhoe.

2.3 SAMPLE PRESERVATION, CONTAINERS, HANDLING, AND STORAGE

Chemical preservation of solids is not generally recommended. Refrigeration to 4°C, supplemented by a minimal holding time, is usually the best approach.

2.4 INTERFERENCES AND POTENTIAL PROBLEMS

There are two primary interferences or potential problems associated with soil sampling. These include cross-contamination of samples and improper sample collection. Cross-contamination problems can be eliminated or minimized through the use of dedicated sampling equipment. If this is not possible or practical, then decontamination of sampling equipment is necessary. Improper sample collection can involve using contaminated equipment, disturbance of the matrix resulting in compaction of the sample, or inadequate homogenization of the samples where required, resulting in variable, non-representative results.

2.5 EQUIPMENT/APPARATUS

- sampling plan
- maps/plot plan

- safety equipment, as specified in the health and safety plan
- compass
- tape measure
- survey stakes or flags
- camera and film
- stainless steel, plastic, or other appropriate homogenization bucket or bowl
- 1-quart mason jars w/Teflon liners
- Ziploc plastic bags
- logbook
- labels
- chain of custody forms and seals
- field data sheets
- cooler(s)
- ice
- decontamination supplies/equipment
- canvas or plastic sheet
- spade or shovel
- spatula
- scoop
- plastic or stainless steel spoons
- trowel
- continuous flight (screw) auger
- bucket auger
- post hole auger

- extension rods
- T-handle
- sampling trier
- thin-wall tube sampler
- Vehimeyer soil sampler outfit
 - tubes
 - points
 - drive head
 - drop hammer
 - puller jack and grip
- backhoe

2.6 REAGENTS

Reagents are not used for the preservation of soil samples. Decontamination solutions are specified in ERT SOP #2006, Sampling Equipment Decontamination.

2.7 PROCEDURES

2.7.1 Preparation

- 1. Determine the extent of the sampling effort, the sampling methods to be employed, and which equipment and supplies are required.
- 2. Obtain necessary sampling and monitoring equipment.
- 3. Decontaminate or preclean equipment, and ensure that it is in working order.
- 4. Prepare schedules, and coordinate with staff, client, and regulatory agencies, if appropriate.
- 5. Perform a general site survey prior to site entry in accordance with the site-specific health and safety plan.
- Use stakes, buoys, or flagging to identify and mark all sampling locations. Consider specific site

factors, including extent and nature of contaminant, when selecting sample location. If required, the proposed locations may be adjusted based on site access, property boundaries, and surface obstructions. All staked locations will be utility-cleared by the property owner prior to soil sampling.

2.7.2 Sample Collection

Surface Soil Samples

Collect samples from near-surface soil with tools such as spades, shovels, and scoops. Surface material can be removed to the required depth with this equipment, then a stainless steel or plastic scoop can be used to collect the sample.

This method can be used in most soil types but is limited to sampling near surface areas. Accurate, representative samples can be collected with this procedure depending on the care and precision demonstrated by the sampling team member. The use of a flat, pointed mason trowel to cut a block of the desired soil can be helpful when undisturbed profiles are required. A stainless steel scoop, lab spoon, or plastic spoon will suffice in most other applications. Avoid the use of devices plated with chrome or other materials. Plating is particularly common with garden implements such as potting trowels.

Follow these procedures to collect surface soil samples.

- 1. Carefully remove the top layer of soil or debris to the desired sample depth with a pre-cleaned spade.
- 2. Using a pre-cleaned, stainless steel scoop, plastic spoon, or trowel, remove and discard a thin layer of soil from the area which came in contact with the spade.
- 3. If volatile organic analysis is to be performed, transfer a portion of the sample directly into an appropriate, labeled sample container(s) with a

stainless steel lab spoon, plastic lab spoon, or equivalent and secure the cap(s) tightly. Place the remainder of the sample into a stainless steel, plastic, or other appropriate homogenization container, and mix thoroughly to obtain a homogenous sample representative of the entire sampling interval. Then, either place the sample into appropriate, labeled container(s) and secure the cap(s) tightly; or, if composite samples are to be collected, place a sample from another sampling interval into the homogenization container and mix thoroughly. When compositing is complete, place the sample into appropriate, labeled container(s) and secure the cap(s) tightly.

Sampling at Depth with Augers and Thin-Wall Tube Samplers

This system consists of an auger, a series of extensions, a "T" handle, and a thin-wall tube sampler (Appendix A, Figure 1). The auger is used to bore a hole to a desired sampling depth, and is then withdrawn. The sample may be collected directly from the auger. If a core sample is to be collected, the auger tip is then replaced with a thin-wall tube sampler. The system is then lowered down the borehole, and driven into the soil at the completion depth. The system is withdrawn and the core collected from the thin-wall tube sampler.

Several types of augers are available. These include: bucket, continuous flight (screw), and posthole augers. Bucket augers are better for direct sample recovery since they provide a large volume of sample in a short time. When continuous flight augers are used, the sample can be collected directly from the flights, which are usually at 5-feet intervals. The continuous flight augers are satisfactory for use when a composite of the complete soil column is desired. Posthole augers have limited utility for sample collection as they are designed to cut through fibrous, rooted, swampy soil.

Follow these procedures for collecting soil samples with the auger and a thin-wall tube sampler.

- 1. Attach the auger bit to a drill rod extension, and attach the 'T' handle to the drill rod.
- 2. Clear the area to be sampled of any surface debris (e.g., twigs, rocks, litter). It may be advisable to remove the first 3 to 6 inches of surface soil for an area approximately 6 inches in radius around the drilling location.
- periodically 3. Begin augering. depositing removing and accumulated soils onto a plastic sheet spread near the hole. prevents accidental brushing of loose material back down the borehole when removing the auger or adding drill rods. It also facilitates refilling the hole, and avoids possible contamination of the surrounding area.
- 4. After reaching the desired depth, slowly and carefully remove the auger from boring. When sampling directly from the auger, collect sample after the auger is removed from boring and proceed to Step 10.
- 5. Remove auger tip from drill rods and replace with a pre-cleaned thin-wall tube sampler. Install proper cutting tip.
- 6. Carefully lower the tube sampler down the borehole. Gradually force the tube sampler into the soil. Care should be taken to avoid scraping the borehole sides. Avoid hammering the drill rods to facilitate coring as the vibrations may cause the boring walls to collapse.
- 7. Remove the tube sampler, and unscrew the drill rods.
- 8. Remove the cutting tip and the core from the device.

- 9. Discard the top of the core (approximately 1 inch), as this represents material collected before penetration of the layer of concern. Place the remaining core into the appropriate labeled sample container(s). Sample homogenization is not required.
- 10. If volatile organic analysis is to be performed, transfer a portion of the sample directly into an appropriate, labeled sample container(s) with a stainless steel lab spoon, plastic lab spoon, or equivalent and secure the cap(s) tightly. Place the remainder of the sample into a stainless steel, plastic, or other appropriate homogenization container, and mix thoroughly to obtain a homogenous sample representative of the entire sampling interval. Then, either place the sample into appropriate, labeled container(s) and secure the cap(s) tightly; or, if composite samples are to be collected, place a sample from another sampling interval into the homogenization container and mix thoroughly. When compositing is complete, place the sample into the appropriate, labeled container(s) and secure the cap(s) tightly.
- 11. If another sample is to be collected in the same hole, but at a greater depth, reattach the auger bit to the drill and assembly, and follow steps 3 through 11, making sure to decontaminate the auger and tube sampler between samples.
- 12. Abandon the hole according to applicable state regulations.

 Generally, shallow holes can simply be backfilled with the removed soil material.

Sampling at Depth with a Trier

The system consists of a trier, and a "T" handle. The auger is driven into the soil to be sampled and used to extract a core sample from the appropriate depth.

Follow these procedures to collect soil samples with a sampling trier:

- Insert the trier (Appendix A, Figure 2) into the material to be sampled at a (0° to 45° angle from horizontal. This orientation minimizes the spillage of sample.
- 2. Rotate the trier once or twice to cut a core of material.
- 3. Slowly withdraw the trier, making sure that the slot is facing upward.
- If volatile organic analysis is to be 4. performed, transfer a portion of the sample directly into an appropriate, labeled sample container(s) with a stainless steel lab spoon, plastic lab spoon, or equivalent and secure the cap(s) tightly. Place the remainder of the sample into a stainless steel, plastic, or other appropriate homogenization container, and mix thoroughly to obtain a homogenous sample representative of the entire sampling interval. Then, either place the sample into an appropriate, labeled container(s) and secure the cap(s) tightly; or, if composite samples are to be collected, place a sample from another sampling interval into the homogenization container and mix thoroughly. When compositing is complete, place the sample into an appropriate, labeled container(s) and secure the cap(s) tightly.

Sampling at Depth with a Split Spoon (Barrel) Sampler

The procedure for split spoon sampling describes the collection and extraction of undisturbed soil cores of 18 or 24 inches in length. A series of consecutive cores may be extracted with a split spoon sampler to give a complete soil column profile, or an auger may

be used to drill down to the desired depth for sampling. The split spoon is then driven to its sampling depth through the bottom of the augured hole and the core extracted.

When split tube sampling is performed to gain geologic information, all work should be performed in accordance with ASTM D 1586-67 (reapproved 1974).

Follow these procedures for collecting soil samples with a split spoon.

- 1. Assemble the sampler by aligning both sides of the barrel and then screwing the bit onto the bottom and the heavier head piece onto the top.
- 2. Place the sampler in a perpendicular position on the sample material.
- Using a sledge hammer or well ring, if available, drive the tube.
 Do not drive past the bottom of the head piece or compression of the sample will result.
- 4. Record in the site logbook or on field data sheets the length of the tube used to penetrate the material being sampled, and the number of blows required to obtain this depth.
- 5. Withdraw the sampler, and open by unscrewing the bit and head and splitting the barrel. If a split sample is desired, a cleaned, stainless steel knife should be used to divide the tube contents in half, longitudinally. This sampler is typically available in diameters of 2 and 3 1/2 inches. However, in order to obtain the required sample volume, use of a larger barrel may be required.
- 6. Without disturbing the core, transfer it to an appropriate labeled sample container(s) and seal tightly.

Test Pit/Trench Excavation

These relatively large excavations are used to remove sections of soil, when detailed examination of soil characteristics (horizontal structure, color, etc.) are required. It is the least cost effective sampling method due to the relatively high cost of backhoe operation.

Follow these procedures for collecting soil samples from test pit/trench excavations.

- 1. Prior to any excavation with a backhoe, it is important to ensure that all sampling locations are clear of utility fines and poles (subsurface as well as above surface).
- 2. Using the backhoe, dig a trench to approximately 3 feet in width and approximately 1 foot below the cleared sampling location. Place removed or excavated soils on plastic sheets. Trenches greater than 5 feet deep must be sloped or protected by a shoring system, as required by OSHA regulations.
- 3. Use a shovel to remove a 1- to 2-inch layer of soil from the vertical face of the pit where sampling is to be done.
- 4. Take samples using a trowel, scoop, or coring device at the desired intervals. Be sure to scrape the vertical face at the point of sampling to remove any soil that may have fallen from above, and to expose fresh soil for sampling. In many instances, samples can be collected directly from the backhoe bucket.
- 5. If volatile organic analysis is to be performed, transfer a portion of the sample directly into an appropriate, labeled sample container(s) with a stainless steel lab spoon, plastic lab spoon, or equivalent and secure the cap(s) tightly. Place the remainder

of the sample into a stainless steel, plastic, or other appropriate homogenization container, and mix thoroughly to obtain a homogenous sample representative of the entire sampling interval. Then, either place the sample into appropriate, labeled container(s) and secure the cap(s) tightly; or, if composite samples are to be collected, place a sample from another sampling interval into the homogenization container and mix thoroughly. When compositing is complete, place the sample into appropriate, labeled container(s) and secure the cap(s) tightly.

6. Abandon the pit or excavation according to applicable state regulations. Generally, shallow excavations can simply be backfilled with the removed soil material.

2.8 CALCULATIONS

This section is not applicable to this SOP.

2.9 QUALITY ASSURANCE/ QUALITY CONTROL

There are no specific quality assurance activities which apply to the implementation of these procedures. However, the following QA procedures apply:

- All data must be documented on field data sheets or within site logbooks.
- All instrumentation must be operated in accordance with operating instructions as supplied by the manufacturer, unless otherwise specified in the work plan. Equipment checkout and calibration activities must occur prior t o sampling/operation, and they must be documented.

2.10 DATA VALIDATION

5 . F. 14.9

This section is not applicable to this SOP.

2.11 HEALTH AND SAFETY

When working with potentially hazardous materials, follow U.S. EPA, OSHA, and specific health and safety procedures.

APPENDIX C

BOREHOLE LOGS

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APPENDIX D USEPA ERT/REAC SPECTRACE 2000 XRF SOP

SPECTRACE 9000 FIELD PORTABLE X-RAY FLUORESCENCE OPERATING PROCEDURE

USEPA - SOP #1713

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1.0 SCOPE AND APPLICATION

The purpose of this Standard Operating Procedure (SOP) is to serve as a guide to the start up, check out, operation, calibration, and routine use of the Spectrace 9000 instrument for field use in screening hazardous or potentially hazardous inorganics. It is not intended to replace or diminish the use of the Spectrace 9000 Operating Instructions. The Operating Instructions contain additional information for optimizing instrument performance and for utilizing its different applications.

The procedures contained herein are general operating procedures which may be changed as required, depending on site conditions, equipment limitations, limitations imposed by the Quality Assurance/Quality Control (QA/QC) procedure or other protocol limitations. In all instances, the procedures finally employed should be documented and included in any or all final reports.

1.1 Principles of Operation

X-Ray Fluorescence (XRF) Spectroscopy is a nondestructive qualitative and quantitative analytical technique used to determine the chemical composition of samples. In a source excited XRF analysis, primary X-rays emitted from a sealed radioisotope source are utilized to irradiate samples. During interaction of the source X-rays with samples, the source X-rays may either undergo scattering (dominating process) or absorption by sample atoms in a process known as the photoelectric effect. This most useful analytical phenomenon originates when incident radiation knocks out an electron from the innermost shell of an atom. The atom is excited and releases its surplus energy almost instantly by filling the created vacancy with an electron from one of the This rearrangement of higher energy shells. electrons is associated with the emission of X-rays characteristic (in terms of energy) of the given atom. This process is referred to as emission of fluorescent X-rays (fluorescent yield). The overall efficiency of the process described is referred to as excitation efficiency and is proportional to the product of the absorption coefficient and the fluorescent yield.

The Spectrace 9000 utilizes characteristic X-ray lines originating from the innermost shells of the atoms K, L and M. The characteristic X-ray lines of the K series are the most energetic lines for any element and, therefore, are the preferred analytical lines. The K lines are always accompanied by the L and M lines

of the same element. However, being of much lower energy than the K lines, they can usually be neglected for those elements for which the K lines are analytically useful. For heavy elements (such as cerium, atomic number (Z)=58, to uranium, Z=92), the L lines are the preferred lines for analysis. The L_{α} and L_{β} lines have almost equal intensities, and the choice of one or the other depends on what interfering lines might be present. A source just energetic enough to excite the L lines will not excite the K lines of the same element. The M lines will appear together with the L lines.

The Spectrace 9000 Operating Instructions contain a table that identifies the X-rays (K or L) and elements measured for each excitation source.

An X-ray source can excite characteristic X-rays from an element only if the source energy is greater than the absorption edge energy for the particular line group (e.g., K absorption edge, L absorption edge, M absorption edge) of the element. The absorption edge energy is somewhat greater than the corresponding line energy. Actually, the K absorption edge energy is approximately the sum of the K, L, and M line energies, and the L absorption edge energy is approximately the sum of the L and M line energies of the particular element.

Energies of the characteristic fluorescent X-rays are converted (within the detector) into a train of electric pulses, the amplitudes of which are linearly proportional to the energy. An electronic multichannel analyzer (electronic unit) measures the pulse amplitudes, which is the basis of a qualitative X-ray analysis. The number of counts at a given energy is representative of element concentration in a sample and is the basis for quantitative analysis.

1.1.1 Scattered X-rays

The source radiation is scattered from the sample by the physical process: coherent or elastic scattering (no energy loss), and Compton or inelastic scattering (small energy loss). Thus, the backscatter (background signal) actually consists of two components with X-ray lines close together. The higher energy line is equal to the source energy. Since the whole sample takes part in scattering, the scattered X-rays usually yield the most intense lines in the spectrum.

Since the scattered X-rays have the highest energies in the spectrum, they contribute most of the total measured intensity signal.

1.2 Sample Types

Solid and liquid samples can be analyzed for elements aluminum through uranium with proper X-ray source selection and instrument calibration. Typical environmental applications are:

- Heavy metals in soil (in situ or samples collected from the surface or from bore hole drillings, etc.), sludges, and liquids (e.g., lead in gasoline)
- Light elements in liquids (e.g., phosphorous, sulphur, and chlorine in organic solutions)
- Heavy metals in industrial waste stream effluents
- PCB in transformer oil by Cl analysis
- Heavy metal air particulates collected on membrane filters, either from personnel samplers or from high volume samplers
- Lead in paint.

2.0 METHOD SUMMARY

The Spectrace 9000 Portable XRF Analyzer employs the radioactive isotope sources iron-55, cadmium-109, and americium-241 for the production of primary X-rays. Each source emits a specific energy range of primary X-rays that cause a corresponding range of elements in a sample to produce fluorescent X-rays. When more than one source can excite the element of interest, the appropriate source(s) is selected according to its excitation efficiency for the element of interest. See page 1-2 of the Spectrace 9000 Operating Instructions for a chart of source types versus element range.

The sample is positioned in front of the source-detector window, and sample measurement is initiated which exposes the sample to primary radiation from the source. Fluorescent and backscattered X-rays from the sample enter through the beryllium detector window and are counted in the high resolution mercuric iodide (HgI₂) detector.

Elemental concentrations are computed using a Fundamental Parameter (FP) algorithm of the form:

Concentration = $R \times S \times (1 + SUM\{A_{\alpha} \times C_{\alpha}\})$

"R" is the measured analyte X-ray intensity to the pure element; "S" is a calculated sensitivity coefficient. The quantity SUM{} is a summation of the "n"-element absorption-enhancement terms containing alpha-coefficients and iteratively computed element concentrations. The Spectrace 9000 utilizes FP XRF calibrations derived from theoretical considerations (as opposed to empirical data). The menu-driven software in the Spectrace 9000 supports multiple XRF calibrations called "Applications." Each Application is a complete analysis configuration including elements to be measured, interfering elements in the sample, and a set of FP calibration coefficients.

The measurement time of each source is user-selectable. The shorter source measurement times (15 - 30s) are generally used for initial screening and hot spot delineation, while longer measurement times (30 - 500s) are typically used for higher precision and accuracy requirements.

3.0 SAMPLE PRESERVATION, CONTAINERS, HANDLING AND STORAGE

This SOP specifically describes equipment operating procedures for the Spectrace 9000; hence, this section is not applicable to this SOP.

4.0 INTERFERENCE AND POTENTIAL PROBLEMS

The total method error for XRF analysis is defined as the square root of the sum of both instrument precision and user or application related error. Generally, the instrument

precision is the least significant source of error in XRF analysis. User or application related error is generally more significant and will vary with each site and method used. The components of the user or application related error are as follows:

4.1 Sample Placement

This is a potential source of error because the X-ray signal decreases as the distance from the radioactive source is increased. However, this error is minimized by maintaining the same distance for each sample.

4.2 Sample Representivity

This can be a major source of error if the sample does not represent the site. Representivity is affected by the soil macro- and micro-heterogeneity. For example, a site contaminated with pieces of slag dumped by a smelting operation will be more heterogenous than a site contaminated by liquid plating waste. This error can be minimized by either mixing a large volume of sample prior to analyzing an aliquot, or by analyzing several locations (in situ) at each sampling point and averaging the results.

4.3 Reference Analysis

Soil chemical and physical matrix effects may be corrected by using Inductively-Coupled Plasma (ICP) or Atomic Absorption (AA) spectroscopy analyzed site-specific soil samples as calibration samples. A major source of error can result if the samples analyzed are not representative of the site and/or if the analytical error is large. Additionally, when comparing XRF results with reference analysis results, the efficiency of the sample digestion reference analysis should be considered. Some digestion methods may breakdown different sample matrices more efficiently than others.

4.4 Chemical Matrix Effects (Due to the Chemical Composition of the Sample)

Chemical matrix effects result from differences in concentrations of interfering elements. These effects appear as either spectral interferences (peak overlaps) or X-ray absorption/enhancement phenomena. Both effects are common in soils contaminated with heavy metals, eg., iron tends to absorb copper X-rays, reducing the intensity of Cu measured by the detector. This effect can be corrected mathematically

through the use of FP coefficients.

4.5 Physical Matrix Effects (Due to Sample Morphology)

Physical matrix effects are the result of variations in the physical character of the sample. They include such parameters as particle size, uniformity, homogeneity, and surface condition. For example, consider a sample in which the analyte exists in the form of very fine particles within a matrix composed of much coarser material. If two separate aliquots of the sample are prepared in such a way that the matrix particles in one are much larger than in the other, then the relative volume of analyte occupied by the analyte-containing particles will be different in each. When measured, a larger amount of the analyte will be exposed to the source X-rays in the sample containing finer matrix particles; this results in a higher intensity reading for that sample and, consequently, an apparently higher measured concentration for that element.

4.6 Application Error

Generally, the error in the application calibration is insignificant (relative to the other sources of error) IF the instrument's application operating instructions are followed correctly. However, if the sample matrix varies significantly from the design of the application (e.g., using the soil's application to analyze 50% iron mine tailing sample) the application error may become significant.

4.7 Moisture Content

Sample moisture content will affect the analytical accuracy of soils or sludges. The overall error may be secondary when the moisture range is small (5-20%), or it may be a major source of error when measuring the surface of soils that are saturated with water.

4.8 Cases of severe X-ray Spectrum Overlaps

When present in the sample, certain X-ray lines from different elements can be very close in energy, and therefore, interfere by producing a severely overlapped spectrum.

The typical spectral overlaps are caused by the K_p line of element Z-1 (or as with heavier elements, Z-2

or Z-3) overlapping with the K_{α} line of the Z element. This is the so-called K_{α}/K_{β} interference. Since the $K_{\alpha}:K_{\beta}$ intensity ratio for the given element usually varies from 5:1 to 7:1, the interfering element, Z-1, must be present in large concentrations in order to disturb the measurement of analyte Z. The presence of large concentrations of vanadium (V) could disturb the measurement of chromium (Cr). The V K_{α} and K_{β} energy is 5.41 keV. The resolution of the detector is approximately 270 eV. Therefore, large amounts of V in a sample will result in spectral overlap of the V K_{β} with the Cr K_{α} peak. The Spectrace 9000 uses overlap factors to correct for K_{α}/K_{β} spectral overlaps for the elements of interest for a given application.

Other interferences are K/L, K/M, and L/M. While these are less common, the following are examples of a severe overlap:

As Ka/Pb La, S Ka/Pb Ma

In the arsenic (As)/lead case, Pb can be measured from the Pb L_{ρ} line, and arsenic from either the As K_{α} or the K_{ρ} line; this way the unwanted interference can be corrected. However, due to the limits of mathematical corrections, measurement sensitivity is reduced. Generally, As concentrations in samples with Pb:As ratios of 10:1 or more can not be efficiently calculated. This may result in zero As being reported regardless of what the actual As concentration is.

EQUIPMENT/APPARATUS

5.0

5.1 Description of the Spectrace 9000 System

The analyzer utilizes the method of Energy Dispersive XRF (EDXRF) spectrometry to determine the elemental composition of soils, sludges, aqueous solutions, oils, and other waste materials.

The Spectrace 9000 analyzer includes three, compact, sealed, radiation sources contained in a measuring probe. The three excitation sources provided are Fe-55, Cd-109 and Am-241. The analyzer software automatically selects which sources to use and the measurement time for each source based on stored information for each application. The probe is equipped with a high resolution HgI₂ detector. This probe is connected by cable to an environmentally sealed electronic module.

The electronic unit provides internal non-volatile memory for storage of 120 spectra and 300 multi-element analytical reports. An RS-232 serial port is provided for downloading data and spectra to a peripheral device. The multi-element analytical reports and the 2000-channel spectra can be displayed on the instrument's LCD panel. The replaceable and rechargeable internal battery provides for field-portable operation.

The Spectrace 9000 is supplied with three factory-installed FP-based applications (calibrations). A "Soil Samples" application is provided for analysis of soils where the balance of the sample, or that portion not directly measured by the instrument, is silica (SiO₂). A "Thin Film" application is provided for analysis of thin films such as air monitoring filters or wipes. A "PbK in Paint" application is provided for analysis of Pb in paint and is reasonably independent of the type of substrate. Additionally, Spectrace will develop calibrations to meet new user applications (e.g., adding elements to the present "Soil Samples" application).

The Spectrace 9000 can be powered from a 115-volt (or 220-volt) wall outlet or from its four-hour capacity battery. It can be operated in temperatures ranging from 32 to 120°F.

The probe and electronic unit may be exposed to a light rain. However, additional protection is provided when the system (electronic unit and probe) is contained in the optional water repellant carrying case.

5.2 Equipment and Apparatus List

5.2.1 Spectrace 9000 analyzer System

The complete Spectrace 9000 Analyzer System includes:

- Analyzer unit for data acquisition, processing and display
- Hand-held probe including:
 - 1. High-resolution HgL detector

- 2. Three excitation sources (55FE, 109Cd, 241Am)
- 3. Safety cover
- Probe laboratory stand with the following:
 - 1. Base for table top use
 - 2. Safety shield over sample
 - 3. Positioning fixtures for standard 30mm and 40mm X-ray sample cups
 - 4. Interconnecting cable
 - 5. RS-232C Interface cable
 - 6. Two blank check samples
 - 7. Pure element check samples
 - 8. Battery charger
 - 9. Battery pack
 - 10. System carrying/shipping case

Spectrace 9000 Operating Instructions, application software and utilities software. The application software is specific to each unit and cannot be interchanged between different units. The software is identified by the serial number of the unit.

5.2.2 Optional items

- 31-mm diameter sample cups
- X R F polypropylene film, 0.2 mil thick
- Field carrying case
- Peripheral devices such as a printer or IBM compatible

Personal Computer (PC)

Spare probe window assembly

Spare battery pack, charger and charger adaptor (required to charge spare battery outside of data unit)

See the Spectrace 9000 Accessories Price List for additional options.

For mobile lab or laboratory X-ray sample preparation accessories, such as drying ovens, grinders, sieves, etc., consult general laboratory equipment suppliers.

5.2.3 Limits and Precautions

The probes should be handled in accordance with the following radiological control practices:

1. The probe should always be in contact with the surface of the material being analyzed and the analyzed material should completely cover the probe opening (aperture) when the source is exposed. Do not remove a sample or move the probe while the indicator shows SOURCE ON.

SOURCE ON indicators are:

- a. the message on the screen "SOURCE ON"
- b. the flashing light at the base of the probe.
- When the sources are exposed, under no circumstances should the probe be pointed at the operator or surrounding personnel.
- 3. Do not place any part of the operator's or co-worker's body in line of exposure when the sources are exposed or partially covered.

- 4. The probe must be covered with the safety cover or laboratory safety shield when not in use.
- 5. Spectrace Instruments must be notified immediately of any condition or concern relative to the probe's structural integrity, source shielding, source switching condition, or operability.
- 6. The appropriate state agency or the Nuclear Regulatory Commission (NRC) office must be notified (see factory supplied data on radiological safety) immediately of any damage to the radioactive source, or any loss or theft of the device.
- Labels or instructions on the probe(s) must not be altered or removed.
- 8. The user must not attempt to open the probe.
- 9. The source(s) in the probe must be leak tested every six months as described in the Spectrace 9000 Operating Instructions. The leak test Certificates must be kept on file, and a copy must accompany the instrument at all times.
- 10. The probe laboratory safety shield assembly must be used when the probe is inverted for measuring samples contained in cups.
- 11. During operation, the probe must be kept at least 10 feet from computer monitors and any other source of radio frequency (RF). Some monitors have very poor RF shielding and will affect measurement results.
- 12. The Spectrace 9000 should not be dropped or exposed to conditions of excessive shock or vibration.

Additional precautions include:

- 1. The probe cable must never be pulled while unplugging the probe. The probe plug should be grasped at the ribbed metal connector and squeezed and pulled gently while unplugging the connector. The connector must never be forced when plugging in the connector.
- 2. The handle of the electronic unit must not be rotated unless the release buttons on each side of the handle are depressed.
- 3. The Spectrace 9000 should not be stored at an ambient temperature below -4°F or above 110°F.
- 4. The battery charging unit should only be used indoors in dry conditions.
- 5. Battery packs should be changed only in dry conditions.

5.3 Peripheral Devices

The Spectrace 9000 may be used with a wide range of peripheral devices for electronic data capture or printed readout as long as they are compatible with the RS-232 serial I/O protocol. Such devices include terminals, printers, electronic data loggers, PCs, etc.

5.3.1 Communication Cable Connection

Plug the 25-pin connector of the RS-232 Serial I/O cable into the Spectrace 9000 25-pin D connector (the connector just below the display screen on the electronic unit) and the 9-pin connector of the cable into the serial port of the receiving device.

5.3.2 Communication Port Setup

To communicate with an external device, the Spectrace 9000 MUST be set at the same band rate, word length, and parity as the receiving device. The Spectrace 9000 allows you to select various configurations for these parameters in the communication

(Comm.) port setup portion of the More submenu (accessed from the main menu). The default COM setup for application and utilities software is 9600, N,8,1.

5.3.3 User Software

Refer to your PC software manual for details on additional settings that may be required for proper interfacing between the Spectrace 9000 and your particular software.

5.4 <u>Instrument Maintenance</u>

5.4.1 Probe Window

Should the probe window become damaged or punctured, it should be replaced as soon as possible to prevent dust and moisture from entering the probe. Replacement window assemblies can be ordered from Spectrace Instruments. Note the location of the window aperture; it is closer to one end of the window plate. Simply unscrew the old window plate, press any corner of it and remove. Stretch the O-ring for 10 seconds. and lay it back in the groove. The O-ring must lie flat in the groove in order for the new window plate to be installed. Install the new window assembly in the same orientation as the old. If the surface of the window plate is not flush with the face of the probe, the O-ring has probably come out of the groove. Remove the assembly, and try the same procedure again.

5.4.2 Further Information and Troubleshooting

Refer to the Spectrace 9000 Operating Instructions for additional detailed operation and/or maintenance and troubleshooting instructions. If no solution is found in the manual, contact Spectrace Instruments for assistance.

An instrument log should be maintained to document specific corrective actions taken to alleviate any instrument problems, or for recording any service that has been performed.

6.0 REAGENTS

Generally, calibration standards are not necessary for site screening and extent of contamination analyses. Optionally, an application (only the Soil Sample application will be discussed here) can be optimized or verified to be 1:1 proportional to another analytical (reference) method. This can be done by analyzing a set of Site-Specific Calibration Standards (SSCS) and performing a regression analysis on the reference (dependent) and the Spectrace 9000 results (independent) for each element of concern. In an application, any element's calibration can be adjusted by entering the desired slope and offset (intercept) in the Adjust Calibration menu. If any element's calibration has been adjusted in an application, "adj" will appear on the results screen. An adjusted element calibration can be changed back to the initial slope and offset values of 1 and 0, respectively, in the application.

6.1 <u>Site-Specific Calibration Standards</u> (SSCS)

SSCS must be representative of the matrix to be analyzed by XRF. The concentration of the target elements in the SSCS should be determined by independent AA or ICP analyses that meet quality levels for referee data.

6.1.1 SSCS Sampling

See section 4.2 on sample representivity. The SSCS samples must be representative of the matrix to be analyzed by XRF. It does not make sense to collect SSCS samples in the site containment area if you are interested in investigating off-site contamination migration. The matrices may be different and could affect the accuracy of the XRF results. If there are two different matrices on site, collect two sets of SSCS samples.

A full range of target element concentrations is needed to provide a representative calibration curve. Mixing high and low concentration soils to provide a full range of target element concentrations is not recommended due to heterogeneity problems. Unlike liquid samples, solid samples cannot be diluted and re-analyzed.

Additionally, collect several SSCS samples in the concentration range of interest. If the

action level of the site is 500 mg/kg, providing several SSCS samples will tend to improve the XRF analytical accuracy in this concentration range.

Generally, a minimum of seven appropriate SSCS samples should be taken. A minimum sample size of 4 oz. is recommended. A larger size sample should be taken to compensate for sites with greater content of non-representative materials such as rocks and/or organic debris. Standard glass sampling jars should be used.

6.1.2 SSCS Preparation

The SSCS samples should be either air dried overnight, or oven dried at less than 105°C. Aluminum drying pans of large plastic weighing boats for air drying may be used. After drying, remove all large organic debris and non-representative material (twigs, leaves, roots, insects, asphalt, rocks, etc.).

The sample should be sieved through a 10-mesh stainless steel sieve. Clumps of soil and sludge should be broken up against the sieve using a stainless steel spoon. Pebbles and organic matter remaining in the sieve should be discarded. The under-sieve fraction of the material constitutes the sample.

Although the maximum final particle size of 10-mesh is normally recommended, a smaller particle size may be desired. The sample should be mixed by dividing the sieved soil into quarters and physically mixing opposite quarters with a clean stainless steel spoon. Re-combine and repeat the quartering and mixing procedure three times. Place the sieved sample in a clean sample jar and label it with both the site name and sample identification information.

The stainless Steel sieves should be decontaminated using soap and water. They should be dried between samples.

One or more plastic XRF sample cups should be filled with the sieved soil for each SSCS sample. A piece of 0.2-mil polypropylene film should be cut and stretched over the top of the X-ray sample cup until the film is wrinkle-free, then sealed using the plastic securing ring. The cup should be labeled using both the site name and specimen identification information.

Either the XRF sample cup or the balance of the prepared sample, is submitted to the approved laboratory for analysis of the requested element(s) by AA or ICP.

7.0 PROCEDURE

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7.1 <u>Prerequisites</u>

If the Spectrace 9000 will be used in a location where AC power outlets are conveniently accessible, connect the battery charger to the electronic unit and plug the charger cord into the outlet. The probe cable must be connected before the power is switched on. Plugging and unplugging this cable with the power on can damage the detector.

To connect the battery, set the electronics unit on its face and use a flat blade screwdriver to loosen the two one-quarter turn fasteners on the back. Remove the battery pack. Inside, find the cord with the red cap covering the three-pronged plug. Remove the cap and plug it into the battery pack. Put the battery pack into the unit and tighten the fasteners.

Apply power to the Spectrace 9000 by pressing the <ON> button. The electronic unit may not come on with the battery charger hooked up if the battery has been totally drained. The drained battery may require a 10 minute charge prior to start up. In a few seconds, the display shows the version of software. If necessary, adjust the contrast knob located on the underside of the front display. This knob can be turned so far that the display appears blank.

The initial screen displays for about 10 seconds and then a prompt will ask if the time and date are set correctly. The date MUST be set correctly, otherwise serious errors in the source-decay compensation can result. Additionally, the results

tables include the time and date of analysis. The main menu appears after the time and date screen.

If a "battery low" message appears, recharge the battery before proceeding, or operate the unit using line voltage.

Allow the Spectrace 9000 to warm up for approximately 30 minutes after it has been turned on, before performing analysis.

7.1.1 Gain Control

Automatic gain compensation is a feature of both Soil and Thin Samples applications that allow operation of the instrument over a wide range of ambient temperatures and to another without from one day standardization. To maintain this gain control compensation, it is necessary to operate it occasionally with a minimum acquisition time of 50 seconds on the Cd-109 source. If the automatic gain control fails or is out of range, an error message will appear on the screen. If the error message continues to appear after repeat analyses, then the Cd-109 measurement time should be checked and/or an energy calibration should be performed. If the problem continues, contact Spectrace Instruments for help.

7.1.2 Setting Data and Spectrum Store/Send Mode

The Set store/send modes option is located in the More screen of the main menu. Data and/or Spectrum storage must be enabled for automatic on-board storing to occur. Sufficient memory is available to store up to 300 sets of analytical results and up to 120 spectra (apactra for 40 samples since each sample has three spectra). When the available mectra or results memory is full, the spectra or results storage mode is The filled spectra or results disabled. memory must be cleared (deleted) and the respective store mode enabled before results and/or spectra will be stored again.

7.2 General Keys and Menu Software

This section outlines the general keys and basic menu software. Flow charts which describe the menu structure in detail are located in pages 4-13 through 4-17 of the Spectrace 9000 Operating Instructions.

7.2.1 The Keyboard

The row of numeric keys under the LCD screen performs functions defined by labels that the software writes (a menu) to the bottom line of the display. As you move through the various menus, the keys are redefined to provide an efficient user interface.

The keypad to the right of the screen is used for numeric entry. The <CONT/PAUSE> key (referred to as the <CONT>) is used:

- to enter information as an <ENTER> key
- to begin an analysis
- to pause an analysis in progress

The <-> (left arrow) key is used to edit entries before pressing <CONT>.

7.2.2 The Measure (Ready) Screen

This main menu selection displays the application name, revision date and count times for each of the three sources, and accesses other options (see flow diagrams in the Spectrace 9000 Operating Instructions).

7.2.3 The Choose an Application Screen

This main menu selection lists the applications currently loaded in the unit. Applications are selected and source measurement times may be modified in this screen (see flow diagrams in the Spectrace 9000 Operating Instructions).

7.2.4 The Review Stored Results Screen

This main menu selection lists the stored results. Up and Down scroll are used on many screens. When Up and Down are displayed, pressing the <0> (zero) key will toggle to PgUP and PgDN for rapid movement through long lists. Stored results may be reviewed, deleted or sent out the COM port (see flow diagrams in the Spectrace 9000 Operating Instructions).

7.2.5 The Review Stored Spectra Screen

This menu selection lists the stored spectra which may be deleted or transmitted to the COM port (see flow diagrams in the Spectrace 9000 Operating Instructions). You cannot review spectra under this screen. Spectra may be reviewed in the Examine Spectrum portion of the Results screen under the More Options menu selection.

7.2.6 The More (Other Functions) Screen

This main menu selection lists the following functions:

- Set clock/calendar
- Comm. port setup
- Set store/send modes
- Application maintenance
- Examine spectrum

7.2.7 The Results Screen

At the end of the analysis, the Results screen is displayed. If the automatic Store Results mode is enabled, you will be prompted for sample identification (ID) before the results screen is displayed. UP or DOWN scrolls the screen to see more results. When UP and DOWN are displayed, pressing the <0> key will toggle to PgUP and PgDN for rapid movement through long lists. Send transmits the results report to the COM port. Store prompts you to enter an ID and then stores the results in the memory. Measr will immediately begin another analysis

cycle. Opts will bring up the first of two screens (the second screen is located under More Opts of the first screen) of special options under the Results screen (see flow diagrams in the Spectrace 9000 Operating Instructions). The most frequently used functions are the Examine Spectrum and Enable/Disable Display Thresholds located on the second screen of the options.

7.3 Pre-operational Checks

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7.3.1 Energy Calibration Checks

The Energy calibration check is performed daily in the field to verify proper energy calibration. To do this, place the safety cover on the probe. Select the Soil Samples application and measure the safety shield using a minimum acquisition time of 60 seconds for each source. Save the results and spectra for documentation. Select Examine Spectrum under the More Options selection of the Results screen. Examine the spectrum of each source. Locate and record the centroid KeV (using the x12 horizontal magnification) for each of the following peaks:

Source Peak		Theoretical (KeV)	Specification (KeV)	
Cd-109	Pb L-alpha	10.54	+/- 0.040	
	Pb L-beta	12.61	+/- 0.040	
	Pb L-gamma	14.76	+/- 0.040	
	Emission peak	22.10	+/- 0.040	
Fe-55	S K-alpha	2.31	+/- 0.010	
	Emission peak	5.89	+/- 0.010	
Am-241	Pb L-alpha	10.54	+/- 0.050	
	Pb L-beta	12.61	+/- 0.050	
	Pb L-gamma	59.5	+/- 0.20	

Perform an Energy calibration (see Spectrace 9000 Operating Instructions) and then do another if any of the peaks fail to meet specification. The energy calibration check should be performed once at the beginning of the day, after an energy calibration, after loading an application, and whenever the instrument exhibits a persistent drift.

7.3.2 Resolution Check

The resolution check examines the detector's ability to resolve X-ray energies. should be performed once at the beginning Select the Soil Samples of the day. application, and measure a sample of iron using a minimum acquisition time of 60 seconds for the Cd-109 source. Save the results and spectra for documentation. Select Examine spectrum under the More Options screen of the Results screen. Examine the Cd-109 spectrum. Locate and record the maximum peak counts (must be > 1000 counts) of the iron K-alpha peak (6.4 KeV) using the x12 horizontal magnification. Divide the maximum peak counts by two. Examine the right side of the peak and record the counts an KeV of the channel just above one-half the maximum peak count value. Examine the left side of the peak and record the counts and KeV of the channel just below one-half the maximum peak count value. Subtract the left-side KeV from the right-side KeV. The difference should be less than 0.300 If the unit fails to meet this specification, call Spectrace Instruments for assistance.

7.3.3 Blank (Zero) Sample Check

The blank (Zero) sample check is performed to monitor the instrument's zero drift. This should be done once at the beginning of the day, after an energy calibration, after loading an application, and whenever the instrument exhibits a persistent drift on a blank or low level sample.

Mount the probe in the laboratory stand and select the Soil Samples application. Disable the display thresholds. This will permit results less than one standard deviation (STD) to be displayed (even negatives). Measure the TeflonTM blank provided with the unit using a minimum acquisition time of 60 seconds for each source. Review the results table. Most (95%) of the elemental results should be $0\pm(2 \times STD)$ (their respective standard deviation), and all of them (99%) should be $0\pm(3 \times STD)$ (their respective standard deviation). Repeat the

measurement if the unit fails to meet these specifications. If several elements continue to be significantly outside of these specifications, check the probe window and the blank sample for contamination or perform the Acquire background data operation located in the Measure (Ready) screen option. Perform the blank (Zero) sample check again. Save the results and spectra for documentation. Enable the display thresholds prior to sample analysis after the blank check procedure is completed.

7.3.4 Target Element Response Check

The purpose of the target element response check is to ensure that the instrument and the selected application are working properly prior to performing sample analysis. This check should be performed at the beginning of the day. Use low, mid, and high samples, or standards with known concentrations for some or all of the target elements to be checked. Select a low sample near the quantitation limit of the target elements. Select a mid sample near the site action level and a high sample near the maximum concentration of the target elements expected on site.

These samples should be measured using the same source acquisition times that will be used for sample analysis. Save the sample check results and spectra for documentation.

7.4 Selecting Source Measuring Time

The source measuring time may be modified under the Measure screen. Zero (seconds) should never be selected for any application. Generally, for source measurements up to 1000 seconds, the element detection limit will be reduced by 50% for every four-fold (x4) increase in source measuring time. The elements are grouped together according to the radioisotope used for their excitation with typical minimum detection limits shown in Sections 7.4.2 and 7.4.3.

Automatic gain compensation is a feature of both the Soil and Thin Samples applications which allows operation of the instrument over a wide range of ambient temperatures and from one day to another without standardization. To maintain this gain control compensation, it is necessary, occasionally, to operate with a minimum acquisition time of 50 seconds on the Cd-109 source.

The Real/live option toggles between real time (true clock time) and live time (total time the instrument is counting). The latter adds time to the analysis to make up for the time the system is busy processing pulses.

7.4.1 Minimum Source Measuring Times

A minimum measuring time (real or live) of 20 seconds for the Fe-55 source, 30 seconds for the Cd-109 source, and 10 seconds for the Am-241 source is recommended when using the Soil Samples application. Measuring times for a source that excites a target element can be increased if lower detection limits are required.

When using the Thin Samples application, the measuring time for any source may be reduced to 10 seconds if the source does not excite a target element since this application does not correct for interelement effects. If a source excites a target element, a minimum measuring time (real or live) of 60 seconds for the Fe-55 source, 60 seconds for the Cd-109 source, and 120 seconds for the Am-241 source is recommended.

A minimum of 60 seconds is recommended for the Cd-109 source when using the PbK in Paint application.

7.4.2 Typical Minimum Detection Limits (MDLs) for the Soil Samples Application

For source measuring times of 60 seconds, the typical element milligram per kilogram (mg/kg) MDLs for the Soil Samples application are:

Source	Element	ug/cm²
Fe-55	Potassium (K)	325
	Calcium (Ca)	150
	Titanium (Ti)	110
	Chromium (CrLo)	180
Cd-109	Chromium (CrHi)	525
•	Manganese (Mn)	410
	Iron (Fe)	225
	Cobalt (Co)	205
	Nickel (Ni)	125
	Copper (Cu)	90
	Zinc (Zn)	70
	Mercury (Hg)	60
	Arsenic (As)	50
	Selenium (Se)	35
	Lead (Pb)	30
	Rubidium (Rb)	10
	Strontium (Sr)	10
	Zirconium (Zr)	10
	Molybdenum (Mo)	. 10
Am-241	Cadmium (Cd)	180
	Tin (Sn)	100
	Antimony (Sb)	65
	Barium (Ba)	20

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Generally, for source measurements up to 1000 seconds, the element detection limit will be reduced by 50% for every four-fold (x4) increase in source measuring time. Additionally, more elements may be added to the Soil Samples application. Contact Spectrace Instruments for information about modifications to applications.

7.4.3 Typical Minimum Detection Limits (MDLs) for the Thin Samples Application

For source measuring times of 200 seconds for the Fe-55 and Cd-109 sources, and 800 seconds for the Am-241 source, the typical element microgram per square centimeter (ug/cm²) MDLs for the Thin Samples application are:

Source	Element	ug/cm²
Fe-55	Potassium (K)	325
	Calcium (Ca)	150
	Titanium (Ti)	110

Source	Element	ug/cm²
	Chromium (CrLo)	180
Cd-109	Chromium (CrHi)	525
	Manganese (Mn)	410
	Iron (Fe)	225
	Cobalt (Co)	205
	Nickel (Ni)	125
	Copper (Cu)	90
	Zinc (Zn)	70
	Mercury (Hg)	60
	Arsenic (As)	50
	Selenium (Se)	35
•	Lead (Pb)	30
	Rubidium (Rb)	10
	Strontium (Sr)	10
	Zirconium (Zr)	10
	Molybdenum (Mo)	10
Am-241	Cadmium (Cd)	180
	Tin (Sn)	100
	Antimony (Sb)	65
	Barium (Ba)	20

Generally, for source measurements up to 1000 seconds, the element detection limit will be reduced by 50% for every four-fold (x4) increase in source measuring time. Use of thick filters, filters with high background or contamination will result in higher MDLs and require a background subtraction. Additionally, more elements may be added to the Thin Samples application. Contact Spectrace Instruments for information about modifications to applications.

7.5 Sample Handling and Presentation

When making XRF measurements, be sure to maintain constant measurement geometry in order to minimize variations in analysis results. Document any anomalies in measurement geometry, sample surface morphology, moisture content, sample grain size, and matrix (see Section 4.0).

7.5.1 Soil Samples

Soil samples may be analyzed either in situ or in prepared X-ray sample cups. The Soil Samples application assumes the sample to be infinitely thick. For in situ measurements this is almost always the case,

but, for sample cup measurements it is advisable to fill the cup nearly full and tap it on the bench to compact the soil. This ensures that the sample is as uniformly thick as possible from sample to sample. The Spectrace 9000 laboratory stand and safety shield should be used when analyzing sample cups.

An area for in situ analysis should be prepared by removing large rocks and debris. The soil surface should be rendered flat and compact prior to analysis. Spectrace 9000 probe should be held firmly on the ground to maximize instrument contact with the ground. The probe should not be moved during analysis. Analysis of water saturated soils should be avoided. A layer of 0.2-mil polypropylene XRF film may be mounted on the surface probe to minimize contamination. Use of varying thicknesses of plastic (bags) have been shown to interfere in the light element measurement and may affect the FP calibration of the other element concentrations. Additionally, plastic may contain significant levels of target element contamination.

Coarse-grained soils conditions or nuggets of contaminated material may not permit a truly representative sample and may adversely affect the analysis results (typically by under reporting the target element). Such samples should be prepared before analysis. Preparation consistency is important to minimize variation in analytical results.

This application is specifically designed for soil with the assumption that the balance of the material is silica. If samples with a much lighter balance are analyzed, the results will typically be elevated by a factor of two to four. Contact Spectrace Instruments for help in analysis of different matrices.

7.5.2 Thin (Filter) Samples

The Thin Samples application is for analysis of thin samples such as filters or wipes. The detection limits are affected by the thickness of the substrate. Best results are obtained on the thinnest substrates. Always use the probe safety cover when measuring thin samples. This is not only for user safety, it also ensures a controlled background environment and provides a reference signal for the automatic gain control. Probe safety covers should never be interchanged between instruments.

Filters and wipes should be prescreened This will establish the before use. background and contamination levels of the filters or wipes. Care should be used to prevent zinc oxide contamination from disposable gloves. Small 37-mm filters can be mounted between two layers of 0.2-mil thick polypropylene XRF film on 40-mm XRF cups for analysis. Larger filters can be placed on the probe with a sheet of 0.2mil thick polypropylene XRF film between the filter and probe to prevent the window from being contaminated. Then the probe safety cover may be placed over the filter prior to analysis. Filters should be presented loaded side down and wrinkle free.

7.5.3 Lead in Paint

The area selected for analysis should be smooth and representative. The Spectrace 9000 probe should be firmly on the surface to maximize instrument contact. The probe should not be moved during analysis.

When used for specimen application, e.g., on paint chips or non-backed films, remember to use the probe safety cover. In the PbK Application, you should also position a thick neutral sample, such as the quartz disk (blank), behind the specimen before closing the safety lid. Otherwise, the PbK X-rays excited in the safety cover will be sensed by the detector. In this application, do not perform the Acquire background data option from the list of options under the Ready screen.

8.0 CALCULATIONS

The Spectrace 9000 is a direct readout instrument that does not require any calculations.

9.0 QUALITY ASSURANCE/QUALITY CONTROL

9.1 Precision

The precision of the method is monitored by reading the low or mid SSCS selected as described in Section 6.1 at the start and end of sample analysis and after approximately every tenth sample (a daily total of seven measurements is recommended). Determining the precision around the site action level can be extremely important if the XRF results are to be used in an enforcement action. Therefore, selection of an SSCS at or near the site action level or level of concern is recommended. The sample is analyzed by the instrument for the normal field analysis time, and the results are recorded. The standard deviation for each dependent element is calculated. The relative standard deviation (RSD) of the sample mean can be used to calculate precision. The RSD should be within + 20% for the data to be considered adequately precise.

9.1.1 Preliminary Detection Limit (DL) and Quantitation Limit (QL)

A preliminary DL and QL is needed to give the operator an indication of the instrument's capability in the field. A low or blank SSCS sample is selected as described in Section 6.1. More than one standard may be needed to obtain low or blank concentration values for each element. Alternatively, the TeflonTM blank may be used if a blank soil sediment sample is unavailable. Disable the display thresholds to permit display of low or negative results.

The sample is measured ten times, without moving it, using the anticipated field analysis measuring time. The standard deviation of the mean for each target element is calculated (using the N-1 formula).

If the standard deviation has a fractional component, round up to the next whole number prior to calculating the DL and QL.

The definition of the DL is three times the calculated standard deviation value.

The definition of the QL is 10 times the calculated standard deviation value.

9.1.2 The Method Minimum
Detection Limit (MMDL)
and Method Quantitation
Limit (MQL)

The MMDL and MQL may be calculated from the measurement of either a low or blank SSCS, selected as described in Section 6.1, at the start and end of sample analysis, and after approximately every tenth sample (a daily total of seven measurements is recommended).

Disable the display thresholds. This will permit results less than one standard deviation (STD) to be displayed (even negatives). Measure the SSCS using the same analysis, measuring time used for the samples. Enable the display thresholds prior to analyzing the next sample.

The standard deviation of the mean for each target element is calculated. If the standard deviation has a fractional component, round up to the next whole number prior to calculating the MMDL and MQL.

The definition of the MMDL is three times the calculated standard deviation value.

The definition of the MQL is 10 times the calculated standard deviation value.

9.2 Reporting Results

All raw XRF data should be reported including the individual results of multiple analyses of samples and sampling points. The average and concentration range of each analysis should also be reported.

A "reported" value for each analysis or average of multiple analyses should be processed in the following manner.

1. Round the value to the same degree of significance contained in the

SSCS sample assay value (usually two) if the element's calibration has been adjusted (see Section 6.0).

- 2. Report all values less than or equal to the MMDL as not detected (ND).
- 3. Flag and note all values greater than the MMDL and less than or equal to the MQL (usually with a "J" next to the reported value).
- 4. Report all values above the MQL and within the linear calibration range [if the element's calibration has been adjusted (see Section 6.0)].
- 5. Flag and note all values above the linear calibration range (greater than the highest SSCS used in the calibration adjustment procedure) with a """ next to the reported value.

9.3 Accuracy

Accuracy, relative to a specific digestion method and elemental analysis procedure, is determined by sending an XRF analyzed sample (prepared sample cups may be submitted) out for AA or ICP analysis at a laboratory.

To do a total accuracy check, confirmation samples should be collected throughout the entire sampling effort. A minimum of 10% of the samples should be collected including a number of samples at or near the critical level. The results of the metal analysis (dependent) and the XRF analysis (independent) are evaluated with a regression analysis. The correlation coefficient (R²) should be 0.7 or greater. All XRF results are multiplied by the slope prior to substitution for metal analysis results in contouring, kreiging programs, or removal volume estimates.

Another very important source of potential difference between XRF and AA or ICP results is incomplete digestion of the leaching technique. Since XRF is a total elemental technique, any comparison with referee results must account for the possibility of variable extraction depending upon the extraction method used and its ability to dissolve the mineral form in question.

9.3.1 Matrix Considerations

Other types of QA/QC verification should include verification that the instrument calibration is appropriate for the specific site to be assessed. This includes verification of potential multiple soil matrix types that may exist at a site. Matrix variations that affect the XRF measurement include large variations in calcium content, such as may be encountered when going from siliceous to calcareous soils, as well as variations in iron content.

10.0 DATA VALIDATION

10.1 Confirmation Samples

Confirmation samples are recommended at a minimum rate of 10%. Confirmation samples are required if QA2 data objectives have been established for site activities. Ideally, the sample cup that was analyzed by XRF should be the same sample that is sent for AA/ICP analysis. When confirming an in situ analysis, collect a sample from a 6 inch by 6 inch area for both an XRF measurement and confirmation analysis.

The XRF and metals results are analyzed with a regression analysis using either SASTM or StatgraphicsTM software with the intercept forced through zero. The correlation factor between XRF and AA/ICP data should be 0.7 or greater.

10.2 Recording Results

Record all results and monitoring activities in a laboratory or field notebook. Alternatively, record results electronically on a hard drive or floppy disk.

10.3 Downloading Stored Results and Spectra

Results (analytical reports) and spectra which have been stored in the Spectrace 9000 internal memory should be downloaded and captured in disk files on a PC (see Section 5). Spectrace Instruments provides software for this purpose. Additionally, they provide software to prepare results or spectra for importing into a spreadsheet. Refer to the instructions provided

with the programs for details on their operation.

Alternatively, other software with terminal data logging capabilities may be used to capture results and spectra to disk files.

After capturing results to a file, print a copy and save both the disk files and the printout for future reference and documentation purposes.

11.0 HEALTH AND SAFETY

When working with potentially hazardous materials, follow USEPA, OSHA, corporate and/or any other applicable health and safety practices.

12.0 REFERENCES

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APPENDIX E

XRF DATA

```
Application: SOILS with U, Th, Ag Q044
                                        05-27-1994
Meas Time:
              6-DEC-1994 08:27:26
ID: <ECAL>
     ) (
               )
                                 Std. dev.
                  Value
         K
                     980.000
                                      297.000 ppm
         Ca
                     13950.0
                                      381.000 ppm
                                      151.000 ppm
      CrLO
                     180.000
                     370.000
         Fe
                                      304.000 ppm
                                      82.9000 ppm
         Zn
                     305.000
         Sr
                     86.0000
                                      51.2000 ppm
         Mo
                     172.000
                                      30.2000 ppm
         Pb
                                      1710.00 ppm
                      171100
                                      59.0000 ppm
         Rb
                     261.000
         Cd
                                      95.4000 ppm
                     554.000
         Sn
                     219.000
                                      61.3000 ppm
         Sb
                     140.000
                                      42.0000 ppm
                     117.000
                                      17.8000 ppm
         Ba
         Th
                     338.000
                                      60.5000 ppm
Application: SOILS with U, Th, Ag Q044
                                        05-27-1994
Meas Time:
              6-DEC-1994 08:38:13
ID: <RESCHK>
             . )
     ) (
                   Value
                                 Std. dev.
                                      84.8000 ppm
      CrHI
                     231.000
          K
                     210.000
                                      147.000 ppm
         Ca
                     73.0000
                                      71.6000 ppm
                                      1530.00 ppm
                     1600.00
         Mn
                                      10600.0 ppm
         Fe
                1.59200e+06
                     940.000
                                      180.000 ppm
         Zn
         Mo
                     41.0000
                                      19.7000 ppm
         Pb
                     460.000
                                      147.000 ppm
                                       336.000 ppm
         Cd
                     1260.00
                                       124.000 ppm
         Sb
                     190.000
          U
                     7.30000
                                       4.54000 ppm
Application: SOILS with U, Th, Ag Q044
                                         05-27-1994
              6-DEC-1994 08:50:04
Meas Time:
ID: <ZERO>
      ) (
               )
                                 Std. dev.
                   Value
                                       150.000 ppm
                     340.000
          K -
                                       74.6000 ppm
                     242.000
         Ca
                                       87.1000 ppm
       CrLO
                     111.000
                                       53.1000 ppm
         Cu
                     94.0000
         Sr
                     10.9000
                                       5.23000 ppm
```

Application: SOILS with U, Th, Ag Q044 05-27-1994 Meas Time: 6-DEC-1994 09:13:08 ID: <NIST-2709>

	Value	Std.	dev.	
CrHI	74.0000		58.1000	ppm
· K	22100.0		1300.00	ppm
Ca	22180.0		915.000	ppm
Ti	3110.00		394.000	ppm
CrLO	260.000		248.000	ppm
Mn	622.000		71.4000	ppm
Fe	31360.0		246.000	ppm
Cu	45.0000		10.7000	ppm
Zn	164.000		10.4000	ppm
As	31.7000		6.66000	ppm
Sr	270.700		4.13000	ppm
Zr	156.400		2.17000	ppm
Mo	3.40000		1.02000	ppm
Pb	30.0000		3.99000	ppm
Rb	113.500		3.81000	ppm
Sb	67.0000		44.3000	ppm
Ba	680.000		45.4000	ppm
U	3.90000		2.43000	ppm
Th	4.90000		1.57000	ppm

Application: SOILS with U, Th, Ag Q044 05-27-1994 Meas Time: 6-DEC-1994 09:37:37

ID: <NIST2709>
() ()

) (

)

, ,				
	Value	std.	dev.	
CrHI	187.000		60.9000	ppm
K	23000.0		1330.00	ppm
Ca	23230.0		937.000	ppm
Ti	3060.00		398.000	ppm
Mn	627.000		71.8000	ppm
Fe	31470.0		249.000	ppm
Co	147.000		66.9000	ppm
Cu	38.0000		10.6000	ppm
Zn	151.000		10.2000	ppm
As	17.6000		6.73000	ppm
Sr	272.400		4.16000	ppm
Zr	161.100		2.21000	ppm
Mo	3.80000		1.04000	ppm
Pb	41.3000		4.19000	ppm
Rb	111.000		3.80000	ppm
Ba	599.000		43.1000	ppm
U	5.90000		2.45000	ppm
Th	2.10000		1.55000	ppm

4. 4.4.2

Pyridium Site 1 - XRF Data - 12/6/94

ID	TIME	Hg
G170-4	10.80	67 B
G170-6.5	11.38	ប
E210-1.5	11.78	U
E90-7	12.19	ប
D130-7	12.54	U
D190-2	13.49	ប
B70-3	14.34	ប
B130-1	14.74	U
BB-2	15.52	U
B160-1	15.86	U
UNKNOWN	16.51	U
G70-0.5	16.94	U
G70-1.5	17.28	168
DD-5.5	17.63	U

NIST2709	9.22	. 0
NIST2709	9.63	0
NIST2709	10.44	0
NIST2709	13.87	-17.1
NIST2709	15.10	-26.7
NIST2709	17.96	-21.1

```
Application: SOILS with U, Th, Ag Q044
                                        05-27-1994
              6-DEC-1994 10:26:32
Meas Time:
ID: <>
               )
     ) (
                  Value
                                Std. dev.
                                      61.4000 ppm
      CrHI
                     205.000
                     24600.0
         K
                                      1370.00 ppm
         Ca
                     22790.0
                                      934.000 ppm
        Ti
                     3050.00
                                      421.000 ppm
                     715.000
        Mn
                                      73.6000 ppm
                                      251.000 ppm
         Fe
                     31570.0
         Cu
                     30.0000
                                      10.5000 ppm
         Zn
                     150.000
                                      10.2000 ppm
                     32.9000
         As
                                      6.69000 ppm
         Sr
                     272.500
                                      4.17000 ppm
         Zr
                                      2.21000 ppm
                     160.400
         Mo
                     3.70000
                                      1.04000 ppm
         Pb
                     28.3000
                                      3.99000 ppm
         Rb
                                      3.85000 ppm
                     113.400
         Ba
                     510.000
                                      40.2000 ppm
         U
                     5.50000
                                      2.45000 ppm
```

4.50000

Th

1.57000 ppm

```
Application: SOILS with U, Th, Ag Q044
                                        05-27-1994
Meas Time:
              6-DEC-1994 10:48:09
ID: <G170-4>
               )
     ) (
                                 Std. dev.
                  Value
          K
                                      1220.00 ppm
                     18100.0
                                      1430.00 ppm
                     59600.0
         Ca
                     3250.00
         Тi
                                      413.000 ppm
                     441.000
                                      69.4000 ppm
        Mn
         Fe
                     20090.0
                                      190.000 ppm
         Cu
                     29.0000
                                      10.5000 ppm
         Zn
                     116.000
                                      9.89000 ppm
                     8.40000
                                      6.46000 ppm
         As
         Sr
                     90.7000
                                      2.51000 ppm
         Zr
                     358.200
                                      3.23000 ppm
         Mo
                     4.30000
                                      1.18000 ppm
                     67.0000
                                      9.23000 ppm
         Hg
         Pb
                                      4.04000 ppm
                     30.4000
                     94.4000
                                      3.65000 ppm
         Rb
                                      31.6000 ppm
         Ba
                     271.000
                     6.60000
                                      2.39000 ppm
          U
         Th
                     2.70000
                                      1.59000 ppm
```

Application: SOILS with U, Th, Ag Q044 05-27-1994 Meas Time: 6-DEC-1994 11:22:30 ID: <G170-6.5>

	value	Sta.	dev.		
CrHI	131.000	•	65.0000	ppm	
K	28100.0		1460.00	ppm	
Ca	42500.0		1250.00	ppm	
${ t Ti}$	3380.00		417.000	ppm	
Mn.	1747.00		95.5000	ppm	
Fe	30840.0		257.000	ppm	
Cu	52.0000		11.5000	ppm	
Zn	131.000		10.4000	ppm	
As	7.50000		6.71000	ppm	
Sr	73.8000		2.38000	ppm	
Zr	249.300		2.70000	ppm	
Mo	5.20000		1.17000	ppm	
Pb	29.6000		4.25000	ppm	
Rb	114.100		4.00000	ppm	
Ba	311.000		34.8000	ppm	
U	7.30000		2.43000	ppm	
Th	5.60000		1.56000	ppm	

Application: SOILS with U,Th,Ag Q044 05-27-1994 Meas Time: 6-DEC-1994 11:46:52

ID: <E210-1.5>
() ()

• .	Value	std.	dev.	
CrHI	245.000		61.5000	ppm
K	19000.0		1210.00	ppm
Ca	9260.00		622.000	ppm
Тi	4190.00		402.000	ppm
Mn	1521.00		86.3000	ppm
Fe	27540.0		219.000	ppm
Cu	14.2000		9.68000	ppm
Zn	102.100		9.15000	ppm
As	21.3000		6.45000	ppm
Sr	63.9000		2.11000	ppm
Zr	393.200		3.20000	ppm
Mo	7.80000		1.19000	ppm
Pb	36.6000		3.96000	ppm
Rb	64.2000		3.16000	ppm
Sb	61.0000		47.8000	ppm
Ba	173.000		26.2000	ppm
Ag	144.000		82.7000	ppm
Ú	11.5000		2.32000	ppm
Th	2.10000		1.59000	mag

Application: SOILS with U, Th, Ag Q044 05-27-1994 6-DEC-1994 12:11:23 Meas Time: ID: <>) () Std. dev. Value 55.5000 ppm CrHI 92.0000 K 3590.00 746.000 ppm 1410.00 ppm Ca 62400.0 Ti 1310.00 255.000 ppm 229.000 ppm CrLO 450.000 Mn 658.000 61.6000 ppm Fe 7330.00 104.000 ppm Cu 103.000 12.1000 ppm Zn 130.000 11.0000 ppm As 32.8000 7.17000 ppm Sr 90.8000 2.38000 ppm Zr 89.5000 1.55000 ppm Mo 6.40000 1.08000 ppm Pb 39.9000 4.18000 ppm Rb 14.0000 3.08000 ppm Ba 14.0000 12.9000 ppm

80.6000

2.92000 ppm

U

Application: SOILS with U, Th, Ag Q044 05-27-1994 Meas Time: 6-DEC-1994 12:32:05 ID: <D130-7>

() ()

	Value	std.	dev.	,
CrHI	175.000		57.6000	ppm
K	12600.0		1030.00	ppm
Ca	22650.0		897.000	ppm
\mathtt{Ti}	2810.00		365.000	ppm
CrLO	530.000		253.000	ppm
Mn	587.000		63.0000	ppm
Fe	13120.0		139.000	ppm
Cu	48.0000		11.1000	ppm
Zn	142.000		11.1000	ppm
As	12.2000		6.94000	ppm
Sr	73.9000		2.16000	ppm
Zr	194.200		2.13000	ppm
Pb	38.9000		4.25000	ppm
Rb	66.7000	•	3.20000	ppm
Ba	80.0000		18.7000	ppm
Ag	119.000		67.8000	ppm
Ū	18.2000		2.57000	ppm
Th	10.6000		1.76000	ppm

Application: SOILS with U, Th, Ag Q044 05-27-1994 Meas Time: 6-DEC-1994 13:29:29
ID: <D190-2>

	Value	std.	dev.	
CrHI	257.000		62.8000	ppm
K	30000.0		1490.00	ppm
Ca	4570.00		519.000	ppm
Ti	4180.00		406.000	ppm
CrLO	110.000		220.000	ppm
Mn	1771.00		92.7000	ppm
Fe	34850.0		270.000	ppm
Co	40.0000		69.1000	ppm
Ni	-69.0000		18.5000	ppm
Cu	33.0000		10.6000	ppm
Zn	163.000		10.5000	ppm
As	8.20000		6.81000	ppm
Se	-16.1000		3.86000	ppm
Sr	72.6000		2.29000	ppm
Zr	314.000		2.96000	ppm
Mo	2.50000		1.14000	ppm
Hg	-38.0000		7.26000	ppm
Pb	48.4000		4.36000	ppm
Rb	111.200		3.86000	ppm
Cđ	53.0000		131.600	ppm
Sn	130.000		81.6000	ppm
Sb	-27.0000	•	46.2000	ppm
Ba	297.000		33.0000	ppm
Ag	-7.60000		79.8900	ppm
Ũ	7.70000		2.44000	ppm
Th	3.80000		1.59000	ppm

```
Application: SOILS with U, Th, Ag Q044
                                         05-27-1994
Meas Time:
              6-DEC-1994 13:52:06 »
ID: <NIST2709>
               )
     ) (
                   Value
                                 Std. dev.
      CrHI
                                       58.6000 ppm
                     173.000
                     22500.0
                                       1320.00 ppm
          K
                                       939.000 ppm
         Ca
                     23440.0
         Ti
                     3500.00
                                       413.000 ppm
       CrLO
                                       238.000 ppm
                     110.000
                                       70.5000 ppm
         Mn
                     632.000
                                       249.000 ppm
                     31690.0
         Fe
         Co
                    -83.0000
                                       65.3000 ppm
         Ni
                     28.0000
                                       20.0000 ppm
                                       10.5000 ppm
                     29.0000
         Cu
         Zn
                     167.000
                                       10.5000 ppm
                                       6.76000 ppm
         As
                     23.5000
                                       3.85000 ppm
         Se
                    -15.3000
         Sr
                     271.700
                                       4.15000 ppm
         Zr
                     156.300
                                       2.18000 ppm
                                       1.03000 ppm
         Mo
                     3.30000
                    -17.1000
                                       7.65000 ppm
         Hq
         Pb
                     37.8000
                                       4.19000 ppm
                                       3.87000 ppm
         Rb
                     114.900
         Cd
                    -160.000
                                       110.000 ppm
         Sn
                     16.0000
                                       70.4000 ppm
         Sb
                     36.0000
                                       42.3000 ppm
                     647.000
                                       44.6000 ppm
         Ba
         Ag
                     66.0000
                                       74.0000 ppm
          Ū
                     6.70000
                                       2.47000 ppm
                                       1.59000 ppm
         Th
                     6.40000
```

Application: SOILS with U, Th, Ag Q044 05-27-1994 Meas Time: 6-DEC-1994 14:20:25 ID: <B70-3>)) (Std. dev. Value 56.8000 ppm CrHI 163.000 K 16800.0 1140.00 ppm Ca 3540.00 429.000 ppm Ti 4130.00 386.000 ppm CrLO 520.000 229.000 ppm 76.3000 ppm Mn 1110.00 Fe 182.000 ppm 21210.0 Co 53.4000 ppm 21.0000 Ni -62.0000 16.1000 ppm Cu 2.00000 8.94000 ppm 9.25000 ppm Zn 128.600 As 11.6000 5.82000 ppm 3.53000 ppm Se -11.3000 2.02000 ppm Sr 63.7000 Zr 376.700 3.02000 ppm

5.60000

25.0000 78.2000

-22.2000

-92.0000

-15.0000

42.0000

202.000

63.0000

8.00000

5.50000

Mo

Hq

Pb

Rb

Cd

Sn

Sb

Ba

Ag

Th

U

1.11000 ppm

6.73000 ppm 3.60000 ppm

3.18000 ppm

113.300 ppm

68.9000 ppm

43.4000 ppm

26.7000 ppm 74.3000 ppm

2.40000 ppm

1.65000 ppm

```
Application: SOILS with U, Th, Aq Q044
                                         05-27-1994
Meas Time:
              6-DEC-1994 14:44:13
ID: <B130-1>
               )
     )
       (
                                 Std. dev.
                   Value
                     192.000
      CrHI
                                       60.1000 ppm
                     18700.0
                                       1210.00 ppm
          K
                                      885.000 ppm
         Ca
                     21050.0
         Ti
                     4120.00
                                       412.000 ppm
      CrLO
                     250.000
                                       237.000 ppm
         Mn
                     1124.00
                                       79.6000 ppm
                                       214.000 ppm
         Fe
                     25920.0
         Co
                    -103.000
                                       58.9000 ppm
         Ni
                    -45.0000
                                       17.7000 ppm
         Cu
                     75.0000
                                       11.2000 ppm
                                       9.32000 ppm
                     97.7000
         Zn
                     2.70000
         As
                                       8.52000 ppm
         Se
                    -12.1000
                                       3.84000 ppm
                                       2.35000 ppm
         Sr
                     82.2000
         Zr
                     329.500
                                       2.96000 ppm
         Mo
                     5.00000
                                       1.14000 ppm
                                       7.67000 ppm
                    -5.40000
         Hq
         Pb
                     150.100
                                       5.95000 ppm
         Rb
                     79.3000
                                       3.37000 ppm
         Cd
                     22.0000
                                       124.700 ppm
                                       82.4000 ppm
         Sn
                     238.000
                                       45.7900 ppm
         Sb
                     9.80000
         Ba
                     276.000
                                       31.3000 ppm
         Ag
                     64.0000
                                       79.4000 ppm
          Ū
                     8.20000
                                       2.36000 ppm
```

5.20000

Th

1.70000 ppm

Application: SOILS with U, Th, Ag Q044 05-27-1994 Meas Time: 6-DEC-1994 15:06:15 ID: <NIST-2709>

) () Value Std. dev. CrHI 187.000 58.4000 ppm K 1330.00 ppm 22900.0 937.000 ppm Ca 23220.0 Ti 2690.00 413.000 ppm CrLO -170.000 242.000 ppm Mn 775.000 72.9000 ppm Fe 31640.0 250.000 ppm Co 15.0000 66.0000 ppm Ni 19.2000 ppm -17.0000Cu 10.9000 ppm 50.0000 zn 10.1000 ppm 144.000 As 20.7000 6.63000 ppm Se -17.80003.80000 ppm Sr 286.000 4.26000 ppm Zr 160.500 2.21000 ppm Mo 6.00000 1.05000 ppm Hq -26.70007.44000 ppm

34.2000

117.000

79.0000

7.60000

12.0000

585.000

112.000

1.90000

6.00000

4.10000 ppm

3.86000 ppm

117.600 ppm

70.1100 ppm

43.4000 ppm

42.7000 ppm

76.1000 ppm

2.44000 ppm

1.58000 ppm

Pb

Rb

Cd

Sn

Sb

Ba

Ag

U

Th

```
Application: SOILS with U, Th, Ag Q044
                                        05-27-1994
Meas Time:
              6-DEC-1994 15:31:18
ID: <BB-2>
     ) (
                                 Std. dev.
                  Value
      CrHI
                     122.000
                                      58.7000 ppm
          K
                     30200.0
                                      1500.00 ppm
         Ca
                     5840.00
                                      561.000 ppm
                                      432.000 ppm
         Тi
                     4820.00
      CrLO
                    -25.0000
                                      216.000 ppm
                                      83.4000 ppm
        Mn
                     1236.00
         Fe
                     30920.0
                                      250.000 ppm
         Co
                     9.30000
                                      65.0400 ppm
         Ni
                    -31.0000
                                       18.8000 ppm
                     77.0000
         Cu
                                       11.5000 ppm
                     223.000
                                       11.3000 ppm
         Zn
                                       7.39000 ppm
         As
                    -5.40000
                                       3.80000 ppm
         Se
                    -17.0000
         Sr
                     75.5000
                                       2.31000 ppm
         Zr
                     355.700
                                       3.16000 ppm
         Mo
                     5.30000
                                       1.18000 ppm
                    -28.5000
                                       7.34000 ppm
         Ha
                                       5.02000 ppm
         Pb
                     88.8000
         Rb
                     94.8000
                                       3.63000 ppm
         Cd
                    -170.000
                                       124.000 ppm
                                       74.5000 ppm
         Sn
                    -80.0000
                                       50.2000 ppm
         Sb
                     103.000
         Ba
                     315.000
                                       33.3000 ppm
                     135.000
                                       85.1000 ppm
         Ag
                                       2.42000 ppm
          Ü
                     8.70000
         Th
                     2.70000
                                       1.62000 ppm
```

```
Application: SOILS with U, Th, Ag Q044
                                         05-27-1994
Meas Time:
              6-DEC-1994 15:51:23
ID: <B160-1>
               )
     ) (
                               Std. dev.
                  Value
      CrHI
                     96.0000
                                      53.4000 ppm
                                      1080.00 ppm
          K
                     14800.0
         Ca
                     8160.00
                                      576.000 ppm
         Ti
                                      347.000 ppm
                     3450.00
      CrLO
                    -93.0000
                                      167.800 ppm
        Mn
                     942.000
                                      71.8000 ppm
         Fe
                     20500.0
                                      177.000 ppm
         Co
                    -12.0000
                                      52.3000 ppm
         Ni
                    -88.0000
                                      15.4000 ppm
                                      9.48000 ppm
         Cu
                     25.0000
                                      9.83000 ppm
         Zn
                     162.500
         As
                     13.3000
                                      7.12000 ppm
         Se
                    -17.6000
                                      3.45000 ppm
         Sr
                     64.7000
                                      2.04000 ppm
         Zr
                     326.800
                                      2.77000 ppm
         Mo
                     3.80000
                                      1.05000 ppm
                    -21.1000
                                      6.80000 ppm
         Hg
                     88.7000
                                      4.70000 ppm
         Pb
         Rb
                     69.6000
                                      3.04000 ppm
         Cd
                    -19.0000
                                      110.500 ppm
         Sn
                    -53.0000
                                      64.9000 ppm
         Sb
                    -9.70000
                                      39.5800 ppm
         Ba
                     198.000
                                      26.1000 ppm
         Ag
                     112.000
                                      73.6000 ppm
          U
                     6.30000
                                      2.32000 ppm
         Th
                     3.70000
                                      1.64000 ppm
```

```
05-27-1994
Application: SOILS with U, Th, Ag Q044
              6-DEC-1994
Meas Time:
                          16:30:34
ID: <DD-5.5>
               )
     ) ( :
                                 Std. dev.
                   Value
                                       57.6000 ppm
      CrHI
                     112.000
                                       1180.00 ppm
          K
                     17600.0
         Ca
                     20460.0
                                       869.000 ppm
         Тi
                                       385.000 ppm
                     3960.00
       CrLO
                     500.000
                                       236.000 ppm
                                       83.4000 ppm
         Mn
                     1407.00
                                       212.000 ppm
         Fe
                     25750.0
                                       58.9000 ppm
         Co
                    -75,0000
         Ni
                    -55.0000
                                       17.4000 ppm
                                       10.3000 ppm
         Cu
                     35.0000
                                       10.9000 ppm
         Zn
                     200.000
                                       8.48000 ppm
         As
                    -1.00000
                                       3.76000 ppm
         Se
                    -16.6000
                                       2.27000 ppm
         Sr
                     75.6000
                     304.700
                                       2.81000 ppm
         Zr
                                       1.08000 ppm
         Mo
                    0.900000
                                       7.89000 ppm
         Hg
                     5.80000
                     152.000
                                       5.92000 ppm
         Pb
                     82.1000
                                       3.39000 ppm
         Rb
                                       129.000 ppm
         Cd
                     19.0000
                    -56.0000
                                       74.6000 ppm
         Sn
                                       49.9000 ppm
         Sb
                     65.0000
                                       31.3000 ppm
         Ba
                     274.000
                                       82.2000 ppm
         Ag
                     65.0000
                                       2.37000 ppm
                     8.80000
          U
                                       1.69000 ppm
         Th
                     4.70000
```

	Value	Std.	dev.	
CrHI	81.0000		55.4000	ppm
K	18700.0		1210.00	ppm
Ca	17500.0		814.000	ppm
Ti	3700.00		371.000	ppm
CrLO	190.000		212.000	ppm
Mn	1016.00		75.9000	ppm
Fe	26160.0		214.000	ppm
Co	-77.0000		59.0000	ppm
Ni	-41.0000		17.6000	ppm
Cu	23.7000		9.98000	ppm
Zn	224.000		11.1000	ppm
As	-2.80000		8.23000	ppm
Se	-18.7000	*	3.66000	ppm
Sr	70.6000		2.20000	ppm
Zr	275.500		2.65000	ppm
Mo	3.20000		1.07000	ppm
Hg	10.5000		7.88000	ppm
Pb	142.600		5.73000	ppm
Rb	81.5000		3.36000	ppm
Cd	-120.000		122.000	ppm
Sn	66.0000		77.1000	ppm
Sb	-4.70000		44.1000	ppm
Ba	312.000		32.6000	ppm
Ag	36.0000		79.1000	ppm
Ü	8.10000		2.34000	ppm
Th	2.10000	•	1.63000	ppm

```
Application: SOILS with U, Th, Ag Q044
                                         05-27-1994
              6-DEC-1994 17:16:58
Meas Time:
ID: <G70-1.5>
               )
     ) (
                   Value
                                 Std. dev.
                                       62.5000 ppm
      CrHI
                     200.000
          K
                     18800.0
                                       1230.00 ppm
         Ca
                     46700.0
                                       1280.00 ppm
         Ti
                     4560.00
                                       397.000 ppm
      CrLO
                    -95.0000
                                       185.300 ppm
         Mn
                     734.000
                                       73.9000 ppm
         Fe
                     24470.0
                                       213.000 ppm
                                       60.1000 ppm
         Co
                     27.0000
         Ni
                    -59.0000
                                       18.1000 ppm
         Cu
                     26.0000
                                       10.5000 ppm
                                       12.9000 ppm
         Zn
                     324.000
         As
                     4.10000
                                       7.34000 ppm
                                       3.97000 ppm
         Se
                    -14.3000
         Sr
                     89.5000
                                       2.53000 ppm
                                       2.49000 ppm
                     225.300
         Zr
         Mo
                     4.30000
                                       1.09000 ppm
                                       10.9000 ppm
         Hq
                     168.000
         Pb
                     73.9000
                                       4.85000 ppm
                                       3.67000 ppm
         Rb
                     97.2000
         Cd
                     120.000
                                       144.000 ppm
                                       83.0500 ppm
         Sn
                    -8.40000
                    -47.0000
                                       49.7000 ppm
         Sb
                     327.000
                                       34.7000 ppm
         Ba
                                       88.2000 ppm
                     25.0000
         Aq
                                       2.40000 ppm
          U
                     7.50000
```

3.80000

Th

1.58000 ppm

	Value	Std.	dev.	
CrHI	147.000	,	57.3000	ppm
K	9740.00		960.000	ppm
Ca	46800.0	•	1250.00	ppm
Тi	2310.00		316.000	ppm
CrLO	270.000		230.000	ppm
Mn	393.000		58.1000	ppm
Fe	12880.0		140.000	ppm
Co	86.0000		47.3000	ppm
Ni	-71.0000		17.5000	ppm
Cu	59.0000		11.7000	ppm
Zn	136.000		11.4000	ppm
As	31.1000		7.38000	ppm
Se	-9.90000		4.19000	ppm
Sr	73.0000		2.21000	ppm
Zr	132.500		1.83000	ppm
Mo	5.50000		1.09000	ppm
Hg	-18.6000		7.99000	ppm
Pb	37.6000		4.37000	ppm
Rb	39.4000		3.27000	ppm
Cđ	25.0000		99.4000	ppm
Sn	-66.0000		56.6000	ppm
Sb	-36.0000		33.7000	ppm
Вa	44.0000		16.1000	ppm
Ag	83.0000		65.0000	ppm
U	53.0000		2.77000	ppm
Th	3.10000		1.68000	ppm

Application: SOILS with U, Th, Ag Q044 05-27-1994 Meas Time: 6-DEC-1994 17:57:30 ID: <NIST2709>

	Value	Std.	dev.	
CrHI	91.0000		55.3000	ppm
K	23700.0		1350.00	ppm
Ca	21390.0		905.000	ppm
${ t Ti}$	3010.00		410.000	ppm
CrLO	120.000		249.000	ppm
Mn	676.000		70.5000	ppm
Fe	31650.0		250.000	ppm
Co	102.000		66.6000	ppm
Ni	-35.0000		18.9000	ppm
Cu	18.0000		10.2000	ppm
Zn	164.000		10.4000	ppm
As	23.0000		6.52000	ppm
Se	-27.6000		3.61000	ppm
Sr	268.200		4.12000	ppm
Zr	159.700		2.19000	ppm
Mo	2.80000		1.01000	ppm
Нg	-21.1000		7.57000	ppm
Pb	29.0000		3.92000	ppm
Rb	113.600		3.83000	ppm
Cđ	22.0000		116.700	ppm
Sn	186.000		77.5000	ppm
Sb	35.0000		44.4000	ppm
Ba	573.000		42.4000	ppm
Ag	118.000		76.8000	ppm
Ŭ	3.30000		2.42000	ppm
Th	4.00000		1.55000	ppm

```
Application: SOILS with U, Th, Ag 9044 05-27-1994
             7-DEC-1994 08:32:02
Meas Time:
ID: <ECAL>
     ) (
                                Std. dev.
685.600 ppm
                . Value
                    22.0000
      CrHI
                                     310.000 ppm
                    1370.00
         K
                                     386.000 ppm
        Ca
                    14240.0
        Ti
                    61.0000
                                     87.6000 ppm
                    460.000
      CrLO
                                     158.000 ppm
        Mn
                    420.000
                                     586.000 ppm
        Fe
                    980.000
                                     334.000 ppm
        Co
                    110.000
                                     231.000 ppm
        Ni
                    110,000
                                     167.000 ppm
        Cu
                    200.000
                                     106.000 ppm
        Zn
                    153.000
                                     77.1000 ppm
                   -6220.00
                                     982.000 ppm
        As
                   -290.000
                                     100.000 ppm
        Se
        Sr
                    68.0000
                                     50.5000 ppm
                   -204.000
                                     56.0000 ppm
        Zr
        Mo
                    120.000
                                     30.1000 ppm
                   -67.0000
        Hg
                                     129.500 ppm
        Pb
                     170900
                                     1710.00 ppm
                                     60.0000 ppm
        Rb
                    264.000
                    587.000
                                     95.8000 ppm
        Cd
        Sn
                    317.000
                                     65.0000 ppm
                                     43.5000 ppm
        Sb
                    170.000
                    92.0000
                                     16.3000 ppm
        8a
                                     48.8000 ppm
        Ag
                    87.0000
                   -79.0000
         Ū
                                     24.4000 ppm
        Th
                    275.000
                                     60.0000 ppm
Application: SOILS with U, Th, Ag 9044 05-27-1994
Meas Time:
             7-DEC-1994 08:41:15
ID: <RESCHK>
     ) (
                  Value
                                Std. dev.
                    117.000
                                     81.2000 ppm
      CrHI
         K
                    190,000
                                     142.000 ppm
        Ca
                    138.000
                                     70.4000 ppm
        Τi
                   -116.000
                                     58.0000 ppm
                   -46.0000
                                     85.7000 ppm
      CrLO
                    2000.00
                                     1530.00 ppm
        Mn
                                     10600.0 ppm
        Fe
                1.58900e+06
                   -5300.00
                                     2880.00 ppm
        Co
        Ni
                    740.000
                                     1341.00 ppm
                                     320.000 ppm
        Cu
                    180,000
                    990.000
                                     186.000 ppm
        Zn
                                     206.400 ppm
76.3700 ppm
        As
                   -31.0000
        Se
                   -6.50000
                   -13.0000
                                     31.8000 ppm
        Sr
                    45.0000
                                     21.8000 ppm
        Zr
        Mo
                    8.10000
                                     20.6500 ppm
                                     221.000 ppm
        Hg
                   -410.000
        Pb
                    500.000
                                     152.000 ppm
        Rb
                    31.0000
                                     71.5000 ppm
                                     333.000 ppm
        Cd
                    1030.00
        Sn
                    550.000
                                     198.000 ppm
```

Sb

Ba

Ag

Th

Ū

320.000

47.0000

-430.000

16.3000

-11.8000

127.000 ppm 36.2000 ppm

177.000 ppm

5.40000 ppm

4.36000 ppm

17.1

報告!

人的专家的人

```
Application: SOILS with U, Th, Ag Q044 05-27-1994
              7-DEC-1994 08:47:59
Meas Time:
ID: <ZERO>
     ) (
                  Value
                                Std. dev.
                   -220.000
                                      251.000 ppm
      CrHI
                    44.0000
                                      136.700 ppm
         K
                                      63.9900 ppm
                    2.50000
         Ca
        Tí
                    -63.0000
                                      52.3000 ppm
      CrLO
                    211.000
                                      89.4000 ppm
        Mn
                    540.000
                                      247.000 ppm
                                      127.300 ppm
                    -78.0000
        Fe
                   -47.0000
        Co
                                      115.200 ppm
        Ni
                    35.0000
                                      76.5000 ppm
                                      44.5000 ppm
        Cu
                   -52.0000
         Zn
                   -47.0000
                                      46.8000 ppm
                                      30.1000 ppm
                    9.40000
         As
                    3.10000
                                      18.6000 ppm
         Se
                                      4.84000 ppm
                    3.60000
        Sr
                    7.00000
                                      3.21000 ppm
         Zr
         Mo
                  -0.300000
                                      3.59000 ppm
                                      37.6000 ppm
                    53.0000
         Нg
        Pb
                     7.10000
                                      16.8200 ppm
                                      9.25000 ppm
                  -0.200000
         RЬ
         Cd
                    118.000
                                      53.1000 ppm
                                      30.3000 ppm
         Sn
                    -31.0000
                                      19.0000 ppm
6.94000 ppm
         Sb
                    -22.0000
         Ba
                    9.20000
                    -25.0000
                                      32.1000 ppm
         Ag
         ŭ
                    11.0000
                                      10.7000 ppm
         Th
                    -2.80000
                                      7.86000 ppm
Application: SQILS with U, Th, Ag 9044 05-27-1994
              7-DEC-1994 09:10:58
ID: <NIST2709>
     ) (
                  Value
                                Std. dev.
                    255.000
                                      62.6000 ppm
      CrHI
                     25300.0
                                      1390.00 ppm
         K
                    21870.0
        Ca
                                      918.000 ppm
        Τi
                    2710.00
                                      402.000 ppm
                    -200.000
                                      227.000 ppm
      CrLO
                                      72.2000 ppm
        Mn
                    629.000
        Fe
                    31410.0
                                      251.000 ppm
                                      67.2000 ppm
18.8000 ppm
                    186.000
        Co
                    -49.0000
        Ni
                                      10.4000 ppm
10.2000 ppm
                    29.0000
         Cu
        Zn
                    152.000
                    17.8000
                                      6.46000 ppm
        As.
                    -22.2000
                                      3.71000 ppm
         Se
         Sr
                    270.600
                                      4.15000 ppm
                    163.200
                                      2.22000 ppm
        Zr
                    1.10000
                                      1.01000 ppm
        Mo
         Hg
                    -11.5000
                                      7.73000 ppm
                    31.7000
                                      3.92000 ppm
        Pb
                                      3.84000 ppm
        Rb
                    113.800
         Cd
                    -160.000
                                      107.000 ppm
                    -139.000
                                      60.8000 ppm
         Sn
         Sb
                                      40.8000 ppm
                    32.0000
```

80

Ag U

Th

630.000

-26.0000

6.00000 3.30000 43.8000 ppm

67.1000 ppm 2.45000 ppm

1.56000 ppm

Application:SOILS with U,Th,Ag Q044 05-27-1994
Meas Time: 7-DEC-1994 09:30:40
ID: <NIST2709>
() ()

) ()	
	Value	Std. dev.
CrHI	249.000	62.3000 ppm
K	21600.0	1290.00 ppm
Ca	22050.0	912.000 ppm
Ti	3690.00	419.000 ppm
CrLO	100.000	241.000 ppm
Mn	730.000	73.6000 ppm
Fe	31430.0	247.000 ppm
Co	143.000	66.7000 ppm
Ni	-28.0000	19.1000 ppm
Cu	22.0000	10.2000 ppm
Zn	149.000	10.1000 ppm
As	16.3000	6.51000 ppm
Se	-21.5000	3.70000 ppm
Sr	274.100	4.16000 ppm
Zr	155.000	2.17000 ppm
Мо	4.50000	1.02000 ppm
Hg	-18.3000	7.57000 ppm
Pb	34.0000	4.03000 ppm
Rb	113.500	3.82000 ppm
Cd	-48.0000	109.700 ppm
Sn	129.000	71.8000 ppm
Sb	-11.0000	39.3000 ppm
Ba	512.000	40.0000 ppm
Ag	-0.200000	68.1100 ppm
Ũ	3.90000	2.43000 ppm
Th	4.40000	1.57000 ppm

Application:SOILS with U,Th,Ag Q044 05-27-1994
Meas Time: 7-DEC-1994 09:51:49
ID: <A1_1.5-2.0>
() ()

	. Value	Std.	dev.	
CrHI	83.0000		61.1000	ppm
K	22500.0		1310.00	ppm
Ca	9080.00		627.000	ppm
Ti	3500.00		387.000	ppm
CrLO	380.000		236.000	ppm
Mn	1536.00		88.3000	ppm
Fe	31440.0		243.000	ppm
Co	110.000		65.8000	ppm
Ni	-16.0000		19.1000	ppm
Cu	51.0000		10.9000	ppm
Zn	312.000		12.5000	ppm
As	-7.80000		9.90000	ppm
Se	-15.1000		3.85000	ppm
Sr	69.2000		2.22000	ppm
Zr	259.400		2.61000	ppm
Mo	4.90000		1.09000	ppm
Hg	-1.70000		7.88000	ppm
Pb	239.000		7.17000	ppm
Rb	94.1000		3.58000	ppm
Cd	-190.000		127.000	ppm
Sn	33.0000		79.3000	ppm -
Sb	79.0000		50.1000	ppm
Ba	322.000		33.7000	ppm
Ag	-21.0000		80.5000	ppm
U	5.60000		2.37000	ppm
Th	7.80000		1.76000	ppm

Application:SOILS with U,Th,Ag Q044 05-27-1994 Meas Time: 7-DEC-1994 10:16:27 ID: <A2_0-1.5>

	Value	Std.	dev.	
CrHI	167.000		59.7000	ppm
K	22800.0		1310.00	ppm
Ca	12050.0		703.000	ppm
Ti	3800.00		369.000	ppm
CrLO	550.000		227.000	ppm
Mn	1244.00		82.1000	ppm
Fe	28520.0		229.000	ppm
Co	123.000		63.0000	ppm
Ni	-110.000		16.5000	ppm
Cu	53.0000		10.5000	ppm
Zn	253.000		11.3000	ppm
As	-8.50000		9.28000	ppm
Se	-20.3000		3.60000	ppm
Sr	63.4000		2.13000	ppm
Zr	302.800		2.82000	ppm
Mo	4.10000		1.08000	ppm
Hg	7.20000		7.79000	ppm
Pb	213.700		6.68000	ppm
Rb	78.4000		3.33000	ppm
Cd	-140.000		116.000	ppm
Sn	45.0000		73.2000	ppm
Sb	39.0000		44.4000	ppm
8a	210.000		28.0000	
Ag	-4.80000		73.9700	
Ü	7.30000		2.28000	ppm
Th	-0.500000		1.64000	ppm

Application:SOILS with U,Th,Ag Q044 05-27-1994 Meas Time: 7-DEC-1994 10:37:20 ID: <8_1.5-3.0>

	Valu e	Std.	dev.	
CrHI	50.0000		57.6000	ppm
K	18700.0		1200.00	
Ca	8000.00		583.000	ppm
Τi	2950.00		347.000	ppm
CrLO	450.000		221.000	ppm
Mn	2530.00		101.000	ppm
Fe	33020.0		244.000	ppm
Co	32.0000		66.4000	ppm
Ni	-55.0000	•	18.0000	ppm
Cu	45.0000		10.5000	ppm
Zn	229.000		11.1000	ppm
As	-16.4000		8.68000	ppm
Se	-15.9000		3.74000	ppm
Sr	51.9000		1.99000	ppm
Žr	249.700		2.52000	ppm
Mo	5.00000		1.07000	
Hg	-13.7000		7.47000	ppm
Pb	175.700		6.23000	ppm
Rb	101.200		3.59000	ppm
Cd	-110.000		124.000	
Sn	-34.0000		74.3000	ppm
Sb	-28.0000		43.3000	ppm
Ba	323.000		33.3000	ppm
Ag	43.0000		80.2000	ppm
Ū	2.70000		2.35000	ppm
Th	1,10000		1.62000	DOM

Application:SOILS with U,Th,Ag Q044 05-27-1994 Meas Time: 7-DEC-1994 10:37:20 ID: <8_1.5-3.0>

) ()			
	Value	Std.	dev.	
CrHI	50.0000		57.6000	ppm
K	18700.0		1200.00	ppm
Ca	8000.00		583.000	ppm
Ti	2950,00		347.000	ppm
CrLO	450.000		221.000	ppm
Mn	2530.00		101.000	ppm
Fe	33020.0		244.000	ppm
Co	32.0000		66.4000	ppm
· Ni	-55.0000		18.0000	ppm
Cu	45.0000		10.5000	ppm
Zn	229.000		11.1000	ppm
As	-16.4000		8.68000	ppm
Se	-15.9000		3.74000	ppm
Sr	51.9000		1.99000	ppm
Zr	249.700		2.52000	ppm
Mo	5.00000		1.07000	ppm
Hg	-13.7000		7.47000	ppm
Pb	175.700		6.23000	ppm
Rb	101.200		3.59000	ppm
Cd	-110.000		124.000	ppm
Sn	-34.0000		74.3000	ppm
Sb	-28.0000		43.3000	ppm
Ba	323.000		33.3000	ppm
Ag	43.0000		80.2000	ppm
Ū	2.70000		2.35000	ppm
Th	1.10000		1.62000	ppm

Application:SOILS with U,Th,Ag Q044 05-27-1994
Meas Time: 7-DEC-1994 10:58:27
ID: <C1_3.0-5.0>
() ()
Value Std. dev.

	Value	Std.	dev.	
CrHI	46.0000		57.4000	ppm
K	23200.0		1320.00	ppm
Ca	1870.00		390.000	ppm
Ti	5540.00		454.000	ррт
CrLO	78.0000		224.700	ppm
Mn	1011.00		79.1000	ppm
Fe	28390.0		227.000	ppm
Co	141.000		62.7000	ppm
Ni	-55.0000		17.9000	ppm
Cu	14.2000		9.80000	ppm
Zn	152.000		10.1000	ppm
As	23.0000		6.35000	ppm
Se	-24.3000		3.53000	ppm
Sr	72.4000		2.22000	ppm
Zr	422.900		3.38000	ppm
Mo	2.80000		1.18000	ppm
Hg	-15.6000		7.36000	ppm
Pb	26.9000		3.87000	ppm
Rb	83.2000		3.44000	ppm
Cdi	-37.0000		122.100	ppm
Sn	19.0000		74.1000	bbw
Sb	82.0000		48.5000	ppm
Ba	351.000		34.1000	ppm
Ag	17.0000		76.7000	ppm
U	11.3000		2.42000	ppm
Th	7.50000		1.67000	ppm

```
Application:SOILS with U,Th,Ag Q044 05-27-1994 Meas Time: 7-DEC-1994 11:20:31
ID: <82-1-5-2>
       ) (
                                            Std. dev.
61.9000 ppm
1260.00 ppm
                         Value
166.000
         CrHI
                             20200.0
             ·K
                             25880.0
                                                    976.000 ppm
            Ca
                             5100.00
                                                    461.000 ppm
            Tí
                                                    246.000 ppm
88.6000 ppm
                             250.000
         CLLO
                             1511.00
            Mn
                                                    257.000 ppm
69.4000 ppm
19.5000 ppm
14.0000 ppm
17.7000 ppm
                             33200.0
198.000
            Fe
            Co
                            -42.0000
            Ni
                             196.000
755.000
            Cu
            Zn
                            -61.0000
                                                    13.8000 ppm
            As
                                                    3.95000 ppm
2.57000 ppm
                            -21.8000
            Se
            Sr
                             90.8000
                                                    2.76000 ppm
1.16000 ppm
                             270.000
            Zr
                             5.80000
            Mo
                            -12.1000
555.000
                                                     8.10000 ppm
            Hg
                                                     10.6000 ppm
3.69000 ppm
            Pb
```

89.2000 -150.000

81.0000

13.0000 380.000

20.0000 7.60000 4.60000 122.000 ppm 78.3000 ppm 44.9000 ppm

36.3000 ppm

78.6000 ppm 2.34000 ppm

1.88000 ppm

Rb

Cd

Sn

Sb

Ba Ag

Th

Application:SOILS with U,Th,Ag Q044 05-27-1994
Meas Time: 7-DEC-1994 11:41:30
ID: <NIST2709>
() ()

) ()			
	Value	Std.		
CrHI	189.000		59.4000	ppm
K	22200.0		1310.00	
Ca	23260.0		935.000	ppm
Ti	3520.00		420.000	ppm
CrLO	140.000		246.000	ppm
Mn	791.000		73.9000	ppm
Fe	32190.0		252.000	ppm
Co	170.000		67.8000	ppm
Ni	-13.0000		19.7000	ppm
Cu	38.0000		10.7000	ppm
2n	139.000		10.1000	ppm
As	26.0000		6.56000	ppm
Se	-17.3000		3.82000	ppm
Sr	261.700		4.08000	ppm
Zr	161.900		2.20000	ppm
Mo	4.90000		1.05000	ppm
Hg	-35.6000		7.28000	ppm
РĎ	28.0000		3.92000	ppm
Rb	118.000		3.91000	ppm
Cd	-44.0000		112.600	ppm
Sn	103.000		72.6000	ppm
Sb	-63.0000		36.9000	ppm
Ba	556.000		41.7000	ppm
Ag	44.0000		72.0000	ppm
Ŭ	6.40000		2.48000	ppm
Th	0.800000		1.52000	ppm

Application:SOILS with U,Th,Ag Q044 05-27-1994 Meas Time: 7-DEC-1994 12:03:38 ID: <NIST-2709>

) ()	
	Value -	Std. dev.
CrHI	318.000	63.4000 ppm
K	27200.0	1430.00 ppm
Ca	21840.0	924.000 ppm
Ti	3540.00	416.000 ppm
CrLO	-99.0000	230.700. ppm
Mn	795.000	75.2000 ppm
Fe	32270.0	258.000 ppm
Co	101.000	67.8000 ppm
Ni	-30.0000	19.4000 ppm
Cu	17.0000	10.3000 ppm
Zn	142.000	10.2000 ppm
As	13.1000	6.79000 ppm
Se	-23.1000	3.77000 ppm
Sr	270.900	4.19000 ppm
Zr	167.800	2.27000 ppm
Mo	4.00000	1.06000 ppm
Hg	-12.6000	7.86000 ppm
Pb	42.6000	4.27000 ppm
Rb	116.100	3.90000 ppm
Cd	-55.0000	114.600 ppm
Sn	-13.0000	68.8000 ppm
Sb	-56.0000	38.1000 ppm
Ba	595.000	43.2000 ppm
Ag	-5.70000	70.9400 ppm
U	4.20000	2.45000 ppm
Th	4.70000	1.58000 ppm

Application:SOILS with U,Th,Ag Q044 05-27-1994
Meas Time: 7-DEC-1994 12:43:25
ID: <C3_1.0-1.5>
() ()

	Value	Std.	dev.
CrHI	77.0000		53.6000 ppm
K	12040.0		984.000 ppm
Ca	6200.00		509.000 ppm
Ti	4200.00		422.000 ppm
CrLO	54.0000		223.100 ppm
Mn	1059.00		73.5000 ppm
Fe	19070.0		168.000 ppm
Co	76,0000		51.4000 ppm
Ni	-66.0000		15.9000 ppm
Cu	30.7000		9.63000 ppm
Zn	123.600		9.35000 ppm
As	8.40000		6.58000 ppm
Se	-14.4000		3.51000 ppm
Sr	61.5000		1.98000 ppm
Zr	324.300		2.72000 ppm
Mo	2.10000		1.04000 ppm
Нg	-1.40000		7.18000 ppm
Pb	60.3000		4.30000 ppm
Rb	66.9000		3.04000 ppm
Cd	-18.0000		111.500 ppm
Sn	-4.40000		65.9400 ppm
Sb	26.0000		41.9000 ppm
Ba	212.000		26.7000 ppm
Ag	-52.0000		66.7000 ppm
U	9.80000		2.35000 ppm
Th	7.70000		1.68000 ppm

Application:SOILS with U,Th,Ag Q044 05-27-1994 Meas Time: 7-DEC-1994 13:04:09 1D: <83_1.0-2.0>

	Value	Std.	dev.	
CrHI	366.000		65.5000	ppm
K	14800.0		1100.00	ppm
Ca	15060.0		757.000	ppm
Ti	8710.00		596.000	ррп
CrLO	250.000		280.000	ppm
Mn	2004.00		94.3000	ррт
Fe	27220.0		220.000 j	ppm
Co	97.0000			ppm
Ni	70.0000			ppm
Cu	165.000			ppm
Zn	1525.00			ppm
As	-201.000			ppm
Se	-24.8000			ppm
Sr	327.300			ppm
Zr	333.200			ppm
Mo	7.90000			ppm
Hg	-22.9000			ppm
Рb	2229.00			ppm
Rb	79.6000			ppm
Cd	-200.000			ppm
Sn	15.0000			ppm
Sb	-7.80000			ppm
Ba	681.000			ppm
Ag	39.0000			ppm
U	13.5000			ppm
Th	20.8000		2.88000	ppm

Application:SOILS with U,Th,Ag 9044 05-27-1994 Meas Time: 7-DEC-1994 13:25:24 ID: <A3_1.5-2.0>

ıv:	<a3< th=""><th>1.5-2</th><th>U></th></a3<>	1.5-2	U>
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	.Value	Std.	dev.	
CrHI	137.000		60.0000	ppm
K	23400.0		1330.00	ppm
Ca	9680.00		648.000	ppm
Τi	4310.00		429.000	ppm
CrLO	12.0000		225.500	ppm
Mn	1827.00		94.2000	ppm

Co	169.000	76.2000 ppm
Ni	-79.0000	19.4000 ppm
Cu	61.0000	11.4000 ppm
Zn	303.000	12.6000 ppm
As	4.80000	9.46000 ppm
Se	-22.6000	3.86000 ppm
Sr	71.1000	2.34000 ppm
Zr	341.000	3.11000 ppm

i.

Mo	6.00000	1.22000 ppm
Hg	-17.0000	7.93000 ppm
Pb	184.800	6.68000 ppm
Rb	96.3000	3.74000 ppm
Cd	79.0000	132.900 ppm
Sn	-32,0000	77.6000 ppm
Sb	-5.50000	47.6600 ppm
Ba	233.000	30.3000 ppm
Ag	174.000	88.4000 ppm
ŭ	5.60000	2.33000 ppm
Th	5.30000	1.67000 ppm

Application:SOILS with U,Th,Ag 9044 05-27-1994 Meas Time: 7-DEC-1994 13:47:06 ID: <D2-2-2.6>

10:	W2-2-2.07	
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	Val ue	Std.	dev.	
CrHI	109.000		53.9000 p	pm .
K	13700.0		1030.00 p	pm
Ca	920.000		291.000 p	pm
Ti	3050.00		356.000 p	pm
CrLO	27.0000		193.600 p	pm
Mn	450.000			pm
Fe	21820.0		180.000 p	pm
Co	-43.0000			pm
Ni	-81.0000			ρm
Cu	11.6000			pm
Zn	100.500			pm
As	8.10000			pm
Se	-24.3000			pm
Sr	49.7000			pm)
Zr	354.500			ρm
Mo	3.50000			pm
Hg	-26.8000			pm
Pb	27.6000			pm
Rb	67.7000			b m
Cd	-130.000			ρm
\$n	-76.0000		·	pm
Sb	-7.20000			bw
Ba	192.000			bw
Ag	67.0000			bus
U	7.60000			b m
Th	-1.10000		1.55000 p	pm

Application:SOILS with U,Th,Ag Q044 05-27-1994 Meas Time: 7-DEC-1994 14:08:07 ID: <D1_2.0>

	. Value	Std.	dev.	
CrHI	102.000		54.1000	ppm
K	13200.0		1020.00	ppm
Ca	1600.00		330.000	ppm
Ti	5010.00		424.000	ppm
CrLO	380.000		232.000	ppm
Mn	522.000		64.6000	ppm
Fe	16570.0		154.000	ppm
Co	19.0000		47.7000	ppm
Ni	-70.0000		15.4000	ppm
Cu	15.3000		9.15000	ppm
Zn	106.900		8.97000	ppm
As	6.60000		5.60000	ppm
Se	-14.5000		3.42000	ppm
Sr	63.2000		1.98000	ppm
Zr	470.100		3.32000	ppm
Мо	4.30000		1.13000	ppm
Hg	-9.10000		6.88000	ppm
Pb	20.0000		3.46000	ppm
Rb	55.9000		2.86000	ppm
Cd	-11.0000		114.700	ppm
Sn	-0.200000		68.3200	ppm
Sb	-24.0000		40.4000	ppm
Ba	201.000		26.3000	• •
Ag	20.0000		71.9000	ppm
U	8.40000		2.33000	ppm
Th	4.50000		1.68000	ppm

Application:SOILS with U,Th,Ag Q044 05-27-1994
Meas Time: 7-DEC-1994 14:27:56
ID: <>
() ()

,	Value	Std.	dev.	
CrHI	207,000		59.7000	ppm
K	25200.0		1380.00	ppm
Ca	23590.0		950.000	ppm
Ti	3330.00		415.000	ppm
CrLO	180.000		252.000	ppm
Mn	779.000		74.0000	ppm
Fe	32160.0		256.000	ppm
Co	133.000		67.9000	ppm
Ni	-44.0000		19.1000	ppm
Cu	52.0000		11.1000	ppm
Zn	144.000		10.3000	ppm
As	20.2000		6.76000	ppm
Se	-18.7000		3.85000	ppm
Sr	274.000		4.20000	ppm
Zr	167.900	•	2.26000	bbu
Mo	3.50000		1.05000	bbu
Нg	-23.3000		7.64000	ppm
Pb	37.0000		4.16000	ppm
Rb	119.100		3.93000	ppm
Cd	210.000		124.000	bbu
Sn	-8.90000		70.1100	bbu
SÞ	32.0000		46.7000	ppm
Ba	607.000		43.8000	ppm
Ag	40.0000		74.0000	ppm
U	3.90000		2.46000	bbus
Th	. 2.70000		1.56000	ppm

APPENDIX F

XRF LOG ENTRIES

.26

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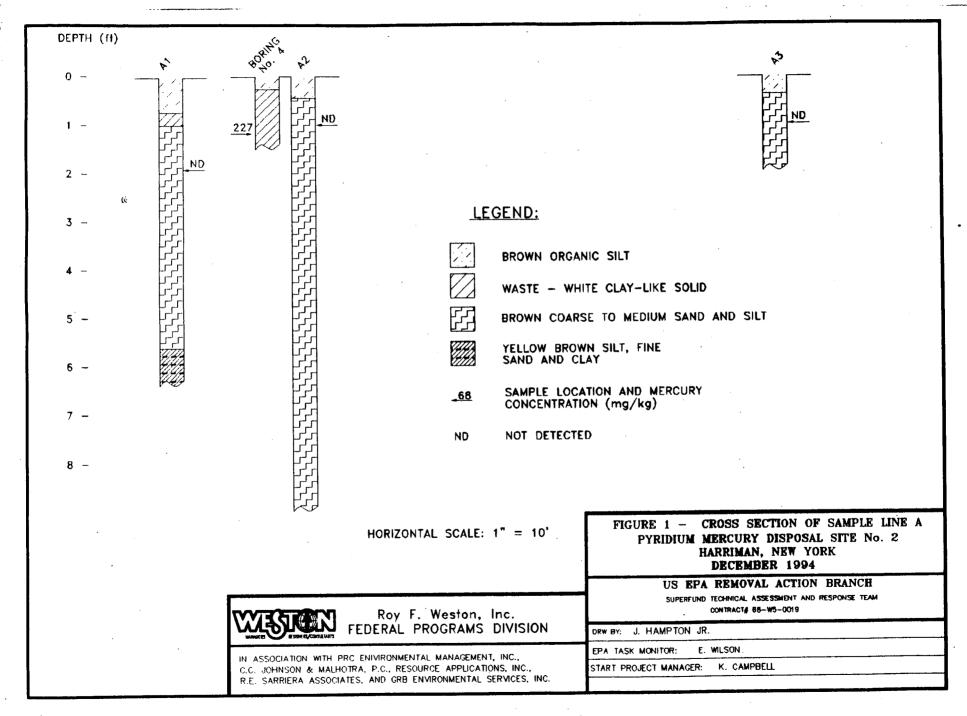
Pyridium Site 11 - XRF Data - 12/6/94

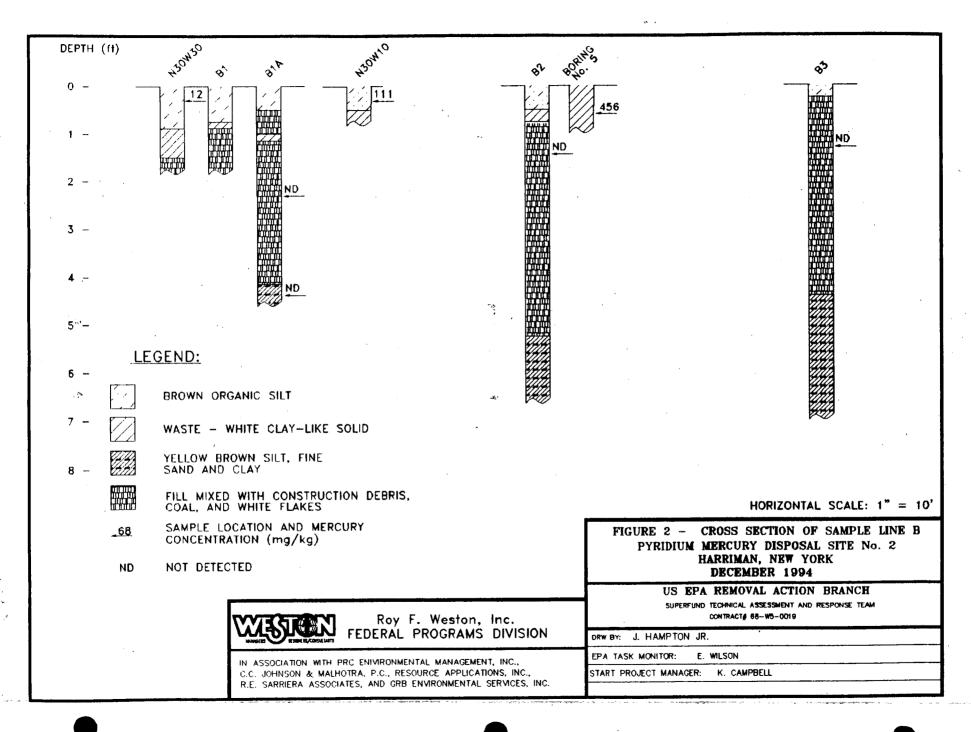
·ĬD	TIME	Hg
G170-4 12	10.80	67 B
G170-6.5 ⅓	11.38	U
E210-1.54	11.78	U
E90-7 -	12.19	U
D130-7©	12.54	ប
D190-2	13.49	U
B70-3 →	14.34	U
B130−1 🔄	14.74	U
BB-2 (4)	15.52	U
B160-1	15.86	U
UNKNOWN	16.51	U
G70-0.5 \ [©]	16.94	Ŭ
G70-1.5	17.28	168
DD-5.5 🥎	17.63	U
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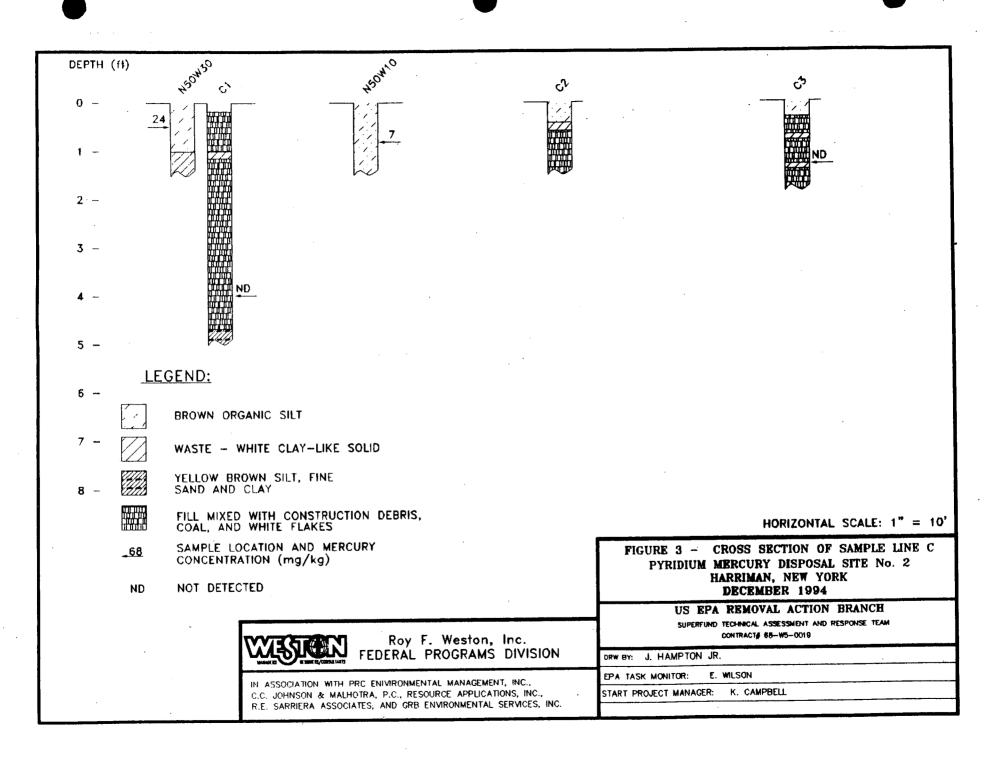
NIST2709	9.22	0
NIST2709	9.63	0
NIST2709	10.44	. 0
NIST2709	13.87	-17.1
NIST2709	15.10	-26.7
NIST2709	17.96	-21.1

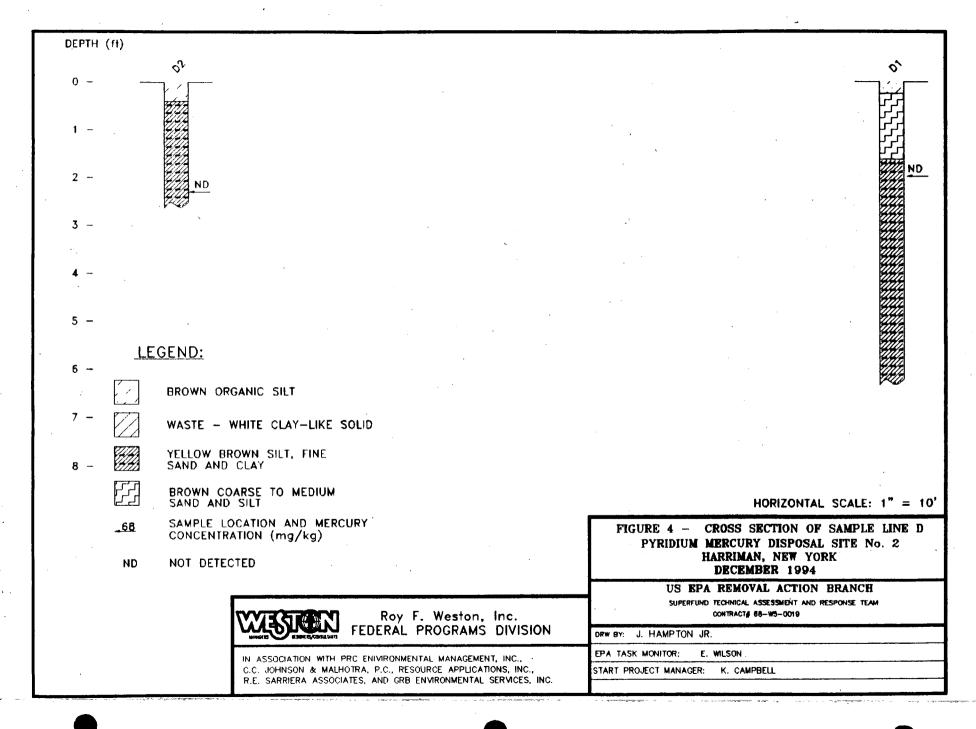
Surple#	Hy Value Qualities
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1 7 7 130 - 7	J. 21-30.9 NO
D190-2	-38.0 ND
NIST: 2709	-11元4 -
B70-3	- ZZ Z ND
B130 -1	5.4 HD
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B-B-A	-3805 HD
B160-1	- 31:/ HD
DO-3-5- P- (E)	
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1620-0.5	1005 NO
G10 45	
/ TDD 5.5	-18.6 ND
NIST 2709	-21.1 ND
DEcember 7, 1984-1	My Adlum Meruz #2
Run time Gol-60 Fe	60 - An -60
ECAL Theor	meioria specs
CUIU4 Phza 10.54 /	0.532 r 0,040
	629 = 0.040
PBLO 14.76 14	1.770 C0340
	1,110 E0.340
Fess S-Ka 2.31. 2.	301 Ev. 010
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PbLA 12.61 12.	602 50.050
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mw 2412	
1/2 max 1206	
R SI Je (Kev) 6.50 -	L SILE KIN 6.26

APPENDIX G
SOIL BORING CRÖSS SECTIONS









APPENDIX H

CALCULATIONS OF AREA OF CONTAMINATION AND VOLUME OF CONTAMINATED SOIL



SHEET of

LIENT/SUBJECTASK DESCRIPTION	- · · · · · · · · · · · · · · · · · · ·	A to the light of the light	TASK	NO	
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SHEET____ of ____

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CLIENT/SUBJECTTASK DESCRIPTION	TASK	TASK NO			
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MATH CHECK BY	DEPT				
METHOD REV. BY	DEPT	DATE	DEPT	DATE	
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APPENDIX I

NIST CERTIFICATE OF ANALYSIS FOR STANDARD REFERENCE MATERIAL 2709



National Institute of Standards & Cechnology

Certificate of Analysis

Standard Reference Material 2709

San Joaquin Soil

Baseline Trace Element Concentrations

This Standard Reference Material (SRM) is intended primarily for use in the analysis of soils, sediments, or other materials of a similar matrix. SRM 2709 is an agricultural soil that was oven-dried, sieved, and blended to achieve a high degree of homogeneity. A unit of SRM 2709 consists of 50 g of the dried material.

The certified elements for SRM 2709 are given in Table 1. The values are based on measurements using one definitive method or two or more independent and reliable analytical methods. Noncertified values for a number of elements are given in Table 2 as additional information on the composition. The noncertified values should not be used for calibration or quality control. Analytical methods used for the characterization of this SRM are given in Table 3 along with analysts and cooperating laboratories. All values (except for carbon) are based on measurements using a sample weight of at least 250 mg. Carbon measurements are based on 100-mg samples.

NOTICE AND WARNINGS TO USERS

Expiration of Certification: This certification is valid for 5 years from the date of shipment from NIST. Should any of the certified values change before the expiration of the certification, purchasers will be notified by NIST. Return of the attached registration card will facilitate notification.

Stability: This material is considered to be stable; however, its stability has not been rigorously assessed. NIST will monitor this material and will report any substantive changes in certification to the purchaser.

<u>Use</u>: A minimum sample weight of 250 mg (dry weight - see Instructions for Drying) should be used for analytical determinations to be related to the certified values on this Certificate of Analysis.

To obtain the certified values, sample preparation procedures should be designed to effect complete dissolution. If volatile elements (i.e., Hg, As, Se) are to be determined, precautions should be taken in the dissolution of SRM 2709 to avoid volatilization losses.

Statistical consultation was provided by S.B. Schiller of the NIST Statistical Engineering Division.

The overall direction and coordination of the analyses were under the chairmanship of M.S. Epstein and R.L. Watters, Jr., of the NIST Inorganic Analytical Research Division.

The technical and support aspects involved in the preparation, certification, and issuance of this Standard Reference Materials Program by T.E. Gills and J.S. Kane.

Gaithersburg, MD 20899 October 30, 1992 William P. Reed, Chief Standard Reference Materials Program

Instructions for Drving: When nonvolatile elements are to be determined, samples should be dried for 2 h at 110 °C. Volatile elements (i.e., Hg, As, Se) should be determined on samples as received; separate samples should be dried as previously described to obtain a correction factor for moisture. Correction for moisture is to be made to the data for volatile elements before comparing to the certified values. This procedure ensures that these elements are not lost during drying. The weight loss on drying has been found to be in the range of 1.8 to 2.5 %.

Source and Preparation of Material: The U.S. Geological Survey (USGS), under contract to the NIST, collected and processed the material for SRM 2709. The soil was collected from a plowed field, in the central California San Joaquin Valley, at Longitude 121° 25' and Latitude 36' 55'. The collection site is in the Panoche fan between the Panoche and Cantu creek beds. The top 7.5-13 cm (3-5 in) of soil containing sticks and plant debris was removed, and the soil was collected from the 13 cm level down to a depth of 46 cm (18 in) below the original surface. The material was shoveled into 0.114 m³ (30-gal) plastic buckets and shipped to the USGS laboratory for processing.

The material was spread on 30.5 cm x 61 cm (1 ft x 2 ft) polyethylene-lined drying trays in an air drying oven and dried for three days at room temperature. The material was then passed over a vibrating 2-mm screen to remove plant material, rocks, and large chunks of aggregated soil. Material remaining on the screen was deaggregated and rescreened. The combined material passing the screen was ground in a ball mill to pass a 74-µm screen and blended for 24 h. Twenty grab samples were taken and measured for the major oxides using x-ray fluorescence spectrometry and for several trace elements using inductively coupled plasma atomic emission analysis to provide preliminary assessment of the homogeneity of the material prior to bottling. The material was bottled into 50-g units and randomly selected bottles were taken for the final homogeneity testing.

Analysis: The homogeneity, using selected elements in the bottled material as indicators, was assessed using x-ray fluorescence spectrometry and neutron activation analysis. In a few cases, statistically significant differences were observed, and the variance due to material inhomogeneity is included in the overall uncertainties of the certified values. The estimated relative standard deviation for material inhomogeneity is less than 1 % for those elements for which homogeneity was assessed.

Certified Values and Uncertainties: The certified values are weighted means of results from two or more independent analytical methods, or the mean of results from a single definitive method, except for mercury. Mercury certification is based on cold vapor atomic absorption spectrometry used by two different laboratories employing different methods of sample preparation prior to measurement. The weights for the weighted means were computed according to the iterative procedure of Paule and Mandel (NBS Journal of Research 87, 1982, pp. 377-385). The stated uncertainty includes allowances for measurement imprecision, material variability, and differences among analytical methods. Each uncertainty is the sum of the half-width of a 95 % prediction interval and includes an allowance for systematic error among the methods used. In the absence of systematic error, a 95 % prediction interval predicts where the true concentrations of 95 % of the samples of this SRM lie.

Table 1. Certified Values

Element	wt. %		Element	#2/ 2		
Aluminum Calcium Iron Magnesium Phospnorus Potassium Silicon Sodium Sulfur Titanium	7.50 ± 1.89 = 3.50 = 1.51 = 0.062 = 2.03 ± 29.66 ± 1.16 ± 0.089 ± 0.342 ±	0.05 0.05 0.11 0.05 0.05 0.05 0.03 0.03 0.02 0.02	Antimony Arsenic Barium Cadmium Chromium Cobalt Copper Lead Manganese Mercury Nickel Selenium Silver Strontium Thallium Vanadium	7.9 17.7 968 0.38 130 13.4 34.6 18.9 538 1.40 88 1.57 0.41 231 0.74 112		0.6 0.8 40 0.01 4 0.7 0.5 17 0.08 5 0.08 0.03 2 0.05 5
•			Zinc	106	=	3

Noncertified Values: Noncertified values, shown in parentheses, are provided for information only. An element concentration value may not be certified if a bias is suspected in one or more of the methods used for certification, or if two independent methods are not available. Certified values for some of these elements, will eventually be provided in a revised certificate when more data is available.

Table 2 Noncertified Values

Element	WL%	Element	<u> 19/9</u>
Carbon	(1.2)	Cerium	. (42)
	•	Cesium	(5.3)
	•	Dysprosium	(3.5)
	•	Europium	(0.9)
		Gallium	(14)
		Gold	(0.3)
•		Hafnium	(3.7)
		Holmium	(0.54)
,		Iodine	(5)
		Lanthanum	(23)
		Molybdenum	(2.0)
		Neodymium	(19)
		Rubidium	(96)
		Samarium	(3.8)
•		Scandium	(12)
		Thorium	(11)
		Tungsten	(2)
		Uranium	(3)
		Ytterbium	(1.6)
	•	Yttrium	(18)
		Zirconium	(160)

Table 3. Analytical Methods Used for the Analysis of SRM 2709

Element	Certification Methods *	Element	Certification Methods
Ag	ID ICPMS; RNAA	Mo	ID ICPMS
لم	XRF1; XRF2: INAA: DCP; ICP	Na	INAA: FAES; ICP
l As	RNAA: HYD AAS: INAA	Nd	ICP
Au	INAA; FAAS	Ni	ID ICPMS; ETAAS; INAA
Ba	XRF2: FAES	P	DCP; COLOR; XRF2
C	COUL	Pb	ID TIMS
Ca	XRF1; XRF2; DCP	Rb	INAA
Cd	ID ICPMS; RNAA	S	ID TIMS
Ce	INAA; ICP	Sb	INAA: ETAAS
Co	INAA; ETAAS; ICP	Sc	INAA; ICP
Cr	INAA; DCP; ICP	Še	RNAA: HYD AAS
Cs	INAA	Si	XRF1; XRF2: GRAV
Сп	RNAA; FAES; ICP	Sm	INAA
Dy	INAA `	Sr	ID TIMS: INAA; ICP
Eu	INAA	Th	ID TIMS; INAA; ICP
Fe	XRF1; XRF2; INAA; DCP	Ti	INAA; XRF1; XRF2; DCP
Ga	INAA; ICP	π	ID TIMS; LEAFS
Hſ	INAA	Ŭ	ID TIMS; INAA
Hg	CVAAS	V	INAA: ICP
Но	INAA	W	INAA
; I	INAA	Y	ICP
K	XRF1; XRF2; FAES; ICP; INAA	Yb	INAA
La	INAA; ICP	Zn ,	ID TIMS; ICP: INAA; POLAR
Mg	INAA; XRF1; ICP	Zr	INAA
Mn	INAA; ICP	•	

*Methods in bold were used to corroborate certification methods or to provide information values.

ID TIMS - Isotope dilution thermal ionization mass spectrometry; mixed acid digestion.

ID ICPMS - Isotope dilution inductively coupled plasma mass spectrometry, mixed acid digestion.

INAA - Instrumental neutron activation analysis.

RNAA - Radiochemical neutron activation analysis; mixed acid digestion.

XRF1 - Wavelength dispersive x-ray fluorescence on fused borate discs.

XRF2 - Wavelength dispersive x-ray fluorescence spectrometry on pressed powder.

ICP - Inductively coupled plasma atomic emission spectrometry, mixed acid digestion.

DCP - Direct current plasma atomic emission spectrometry; lithium metaborate fusion.

ETAAS - Electrothermal atomic absorption spectrometry; mixed acid digestion.

CVAAS - Cold vapor atomic absorption spectrometry.

HYD AAS - Hydride generation atomic absorption spectrometry.

FAAS - Flame atomic absorption spectrometry, mixed acid digestion except for Au, leached with HBr-Bra-

FAES - Flame atomic emission spectrometry, mixed acid digestion.

COLOR - Colorimetry, Hthium metaborate fusion.

GRAV - Gravimetry, sodium carbonate fusion.

COUL - Combustion coulometry.

LEAFS - Laser enhanced atomic fluorescence spectrometry; mixed acid digestion.

POLAR - Polarography.

HEALTH CONSULTATION

PYRIDIUM MERCURY DISPOSAL SITE #2

Orange County

Harriman, New York

CERCLIS NO. NY0000162850

August 28, 1995

Prepared By

New York State Department of Health

Under Cooperative Agreement With

U.S. Department of Health & Human Services
Public Health Service
Agency for Toxic Substances and Disease Registry

HEALTH CONSULTATION

PYRIDIUM MERCURY DISPOSAL SITE #2 HARRIMAN, ORANGE COUNTY, NEW YORK CERCLIS NO. NY000162850

August 28, 1995

Prepared by:

New York State Department of Health Under a Cooperative Agreement with the Agency for Toxic Substances and Disease Registry

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BACKGROUND AND STATEMENT OF ISSUE

The New York State Department of Health (NYS DOH) through a cooperative agreement with the Agency for Toxic Substances and Disease Registry (ATSDR) has reviewed information and analytical data from the Pyridium Mercury Disposal Site #2 to determine if there is a public health threat associated with exposure to The Pyridium Mercury Disposal Site #2 (Figure 1) is located on a residential lot along South Main Street in the Village of Harriman, Town of Monroe, Orange County, near the intersection of Routes 17M (Ramapo Avenue) and South Main Street. within one-quarter mile of Pyridium Site #1, the trailer park (Figure 2). The area of concern (Figure 3), which is about onequarter acre in size, includes an old farmhouse built in the late 1800's that pre-dates the waste disposal activities. This property is bounded to the northwest by an overgrown lot, to the southwest by a gasoline service station, to the southeast by Ramapo Lane and to the northeast by South Main Street. The two-story house has been occupied for approximately three years by a mother with two children, ages six (son) and seven (daughter). Five days each week, three hours each day, a home health aide visits the family. Access to the basement, used only for storage, is from the outside. The stone-walled basement has a concrete floor and is primarily dry throughout the year. According to a local resident, eight to fifteen truckloads of waste materials, a mercuric or mercurous salt generated during the production of niacinamide (vitamin B-3) by the former Pyridium Corporation, were observed to have been dumped during the early 1950's in an "L" shape, down and across the front yard.

On October 21, 1994, the NYS DOH assisted the Village of Harriman Code Enforcement Officer in investigating a report of a possible second disposal site. Test holes were dug with the assistance of the property owner and the Code Enforcement Officer. A Nepera, Inc., official was present during this preliminary investigation. Whitish-gray, Pyridium-like wastes were discovered a few inches below the ground surface at several locations in the front yard. Surface wastes were observed only where a large tree root broke through the grass cover.

On October 26, 1994, at the request of the NYS DOH, the United States Environmental Protection Agency (US EPA) collected one surface soil sample (0-1 inch below ground surface), two subsurface soil samples (0-3 inches below ground surface) and two subsurface waste samples (3-6 inches and 1-6 inches below ground surface). The two subsurface waste samples had significantly elevated levels of mercury (227 and 456 milligrams of total mercury per kilogram of soil [mg/kg]). The surface soil sample collected within the fenced yard, where the two children and family dog spend much of their play time, contained 27.5 mg/kg of total mercury. Mercury is typically found in soils at levels less than 1 mg/kg.

On October 29, 1994, the US EPA collected nine additional surface soil samples (0 to 3 inches below any vegetative cover) to further assess the extent of surface contamination so that appropriate public health decisions could be made. Total mercury levels ranged from 0.1 to 117 mg/kg with an average of 35.1 mg/kg. Mercury contamination appears to increase markedly from the front porch of the home outward toward the reported area of waste disposal. Based on field observations, less obvious mercury contamination in surface soils within the fenced play area may be the result of the family's pet repeatedly digging in the yard.

Based on the results of laboratory testing (speciation) of a waste sample collected from the original Pyridium Mercury Disposal Site #1 (trailer park) and the similar appearance of these wastes, it is presumed that the mercury found in the soils at site #2 is inorganic in nature.

Residents rely on the Village of Harriman municipal water supply for drinking water. These wells are not near the site. The village water is regularly monitored to ensure that it meets the NYS DOH drinking water standards for public water supplies. The service connection from the watermain to the house does not pass through buried waste materials. Entry of contaminants into the buried water pipes is unlikely. Should there be a crack, break, breach, or compromise in the integrity of the waterline piping, positive pressure within the pipes would force water out rather than allow contaminants to seep in. A major break in a waterline would be readily noticed by residents through a loss of water at the tap and by discolored (i.e., dirty) water.

DISCUSSION

Mercury is present at higher than normal background levels in surface soil and surface wastes at the Pyridium Mercury Disposal Site #2. Exposure to mercury in surface soil and surface waste may occur via accidental ingestion (eating) of soil and dust, eating of garden fruits and vegetables grown in contaminated soils, skin contact or breathing of mercury contaminated dust or vapor. Children generally eat greater amounts of soil and dust than adults. This is especially true for preschoolers because they tend to put their hands or fingers in their mouths or for children with pica (an unreasonable craving), in this case, for soil. children who repeatedly handle the waste material extensively would have a greater likelihood of ingesting the mercury waste which could stick to their hands. Mercury contaminated soil can also be tracked into the home on shoes and left on floors and surfaces where people could come in contact with it. A family pet, such as a dog or cat, can walk through, dig into, lie upon, or roll over contaminated soils and carry mercury contamination into the home on its paws and/or fur. Indirect exposure for an infant can occur

from eating contaminated breast milk if the mother was exposed to mercury.

Long-term exposure to sufficiently high levels of mercury can damage the kidneys, nervous system and developing fetus (baby). The most sensitive target organ for low-level inorganic mercury exposure appears to be the kidneys.

Health risk comparison values are used to assess if further evaluation of the soil is needed. Several factors are considered in the evaluation including soil ingestion rate, the size and age of the exposed individual, length of exposure and the health effects data. A health comparison value for mercury in soil is the mercury concentration in soil which would provide, by ingestion, a dose of mercury equal to the daily exposure below which adverse health effects are unlikely to occur. A contaminant at concentrations exceeding a health comparison value does not necessarily mean that either exposure to the contaminant or adverse health effects have occurred or will occur.

Health comparison values are developed assuming worst case exposure, i.e., the greatest exposure possible. Using soil ingestion rates for children with pica overestimates soil ingestion rates for the general public, including most children.

Soil mercury concentrations identified at the site range from 0.1 to 456 mg/kg. Table 1 (Appendix B) contains soil health comparison values for inorganic mercury. The soil mercury concentrations at the site exceed some of the health comparison values. Therefore, the soil concentrations of mercury at the Pyridium Mercury Waste Disposal Site #2 warrant further characterization and evaluation of exposure pathways and the potential for adverse health effects in individuals who may have been exposed to the waste materials.

A child with pica is likely to have the highest exposure and, based on the highest soil mercury concentration (456 ppm), is at high risk of having adverse kidney effects. Children without pica and adults are at minimal risk of having adverse kidney effects. Fruits and vegetables grown in contaminated soil are an additional potential source of exposure. Mercury levels are higher in plants grown in contaminated soil than in those grown in soil which is not contaminated. Eating such plants could contribute additional mercury to the diet.

The soil mercury concentrations at the site provide a source for exposure which could produce health effects in individuals whose activities lead to greater contact with the waste material.

On June 9, 1995, the NYS DOH sent copies of this health consultation to interested parties requesting concerns and comments

on the report by July 13, 1995. The NYS DOH received one comment; the response is in Appendix $D_{\rm cons}$

CONCLUSIONS

Based on the information reviewed, the NYS DOH in consultation with ATSDR concludes the following:

- 1. Based on ATSDR's present public health hazard category classification (Appendix C), the Pyridium Mercury Disposal Site #2 is a public health hazard because inorganic mercury is present in soil at concentrations which may cause adverse health effects. Residents, particularly preschool children who may eat unusual amounts of contaminated soil and residents eating vegetables grown in the contaminated soil, are at risk of kidney damage due to the mercury contamination at the Pyridium Mercury Disposal Site #2.
- 2. At a minimum, exposure to inorganic mercury may have occurred via dermal contact based on discussions with the tenant and on field observations.
- 3. The nature and extent of contamination at this site has not been completely characterized. Contamination other than inorganic mercury may be present within subsurface fill materials.

RECOMMENDATIONS

- 1. Measures should be taken to prevent exposures to front yard soils which contain the mercury wastes. Temporary measures are needed to allow for the residents' daily activities. This action has been completed by the US EPA.
- 2. The nature and extent of contamination at the site should be completely characterized. A comprehensive analysis of the wastes should be performed. Sampling of soils and wastes should extend outward and downward to determine areas requiring future remedial actions. Subsurface investigations might potentially identify other types of chemical wastes used as fill or find buried drums.
- 3. The company or agency that performs the additional environmental sampling should work with the NYS DOH so that sample design and detection levels are appropriate for making public health decisions.
- 4. Impose deed restrictions on the property, in the absence of waste removal, to prevent possible disturbance and contact with buried wastes.

5. During future site clean-up involving excavation, site residents should be temporarily relocated or precautionary measures taken to minimize potential exposures or personal injuries.

HEALTH ACTIVITIES RECOMMENDATION PANEL (HARP) RECOMMENDATIONS

The data and information developed in the Health Consultation for the Pyridium Mercury Disposal Site #2, Harriman, New York, has been reviewed by ATSDR's Health Activities Recommendation Panel (HARP) to determine appropriate follow-up health actions. Because of past and possible current exposure to mercury-contaminated residential soils, the panel recommended this site for follow-up health activities. Specifically, those persons exposed should be medically evaluated for the presence of mercury. In addition, the HARP also determined that community health and health professions education are indicated. The NYS DOH has and will continue to conduct site-specific education activities at the site.

PUBLIC HEALTH ACTIONS

Public Health Actions Taken

- 1. The NYS DOH held a public availability session on November 28, 1994, to provide information to the community about the site and address health-related concerns.
- 2. A NYS DOH physician talked with the adult resident (mother) about health concerns related to the site.
- Urine sampling was offered; whether or not this offer was accepted and any results which might have been obtained are confidential under New York State law.
- 4. In response to a recommendation by the NYS DOH, the US EPA blocked off the fenced, front yard play area to prevent the family dog from potentially digging up contaminated soils. The US EPA also erected a new fenced-in play area in the back yard where no soil contamination was detected.

Public Health Actions Planned

- If authorized, waste removal may occur in summer or fall of 1995. The three residents and dog may be temporarily relocated by the US EPA should excavation of contaminated soil occur.
- 2. The NYS DOH will review all site-related investigation reports and health-related information and, if necessary, hold

additional public meetings to keep the community informed of activities at the site.

3. The NYS DOH will continue to investigate reports of the existence of other similar sites in the community.

CERTIFICATION

The Health Consultation for the Pyridium Mercury Disposal Site #2 was prepared by the New York State Department of Health under a cooperative agreement with the Agency for Toxic Substances and Disease Registry (ATSDR). It is in accordance with approved methodology and procedures existing at the time the health consultation was initiated.

Gregory V. Ulirsch, M.S. Technical Project Officer

Superfund Site Assessment Branch (SSAB)
Division of Health Assessment and Consultation (DHAC)
ATSDR

The Division of Health Assessment and Consultation, ATSDR, has reviewed this health consultation, and concurs with its findings.

Sharon Williams-Fleetwood, Ph.D Chief, SSAB, DHAC, ATSDR

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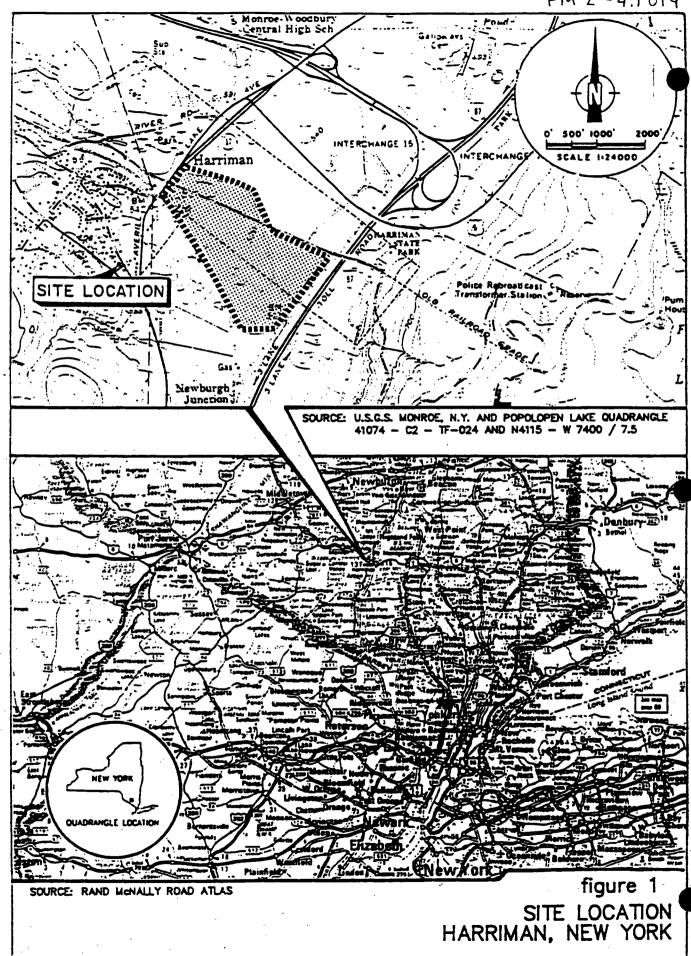
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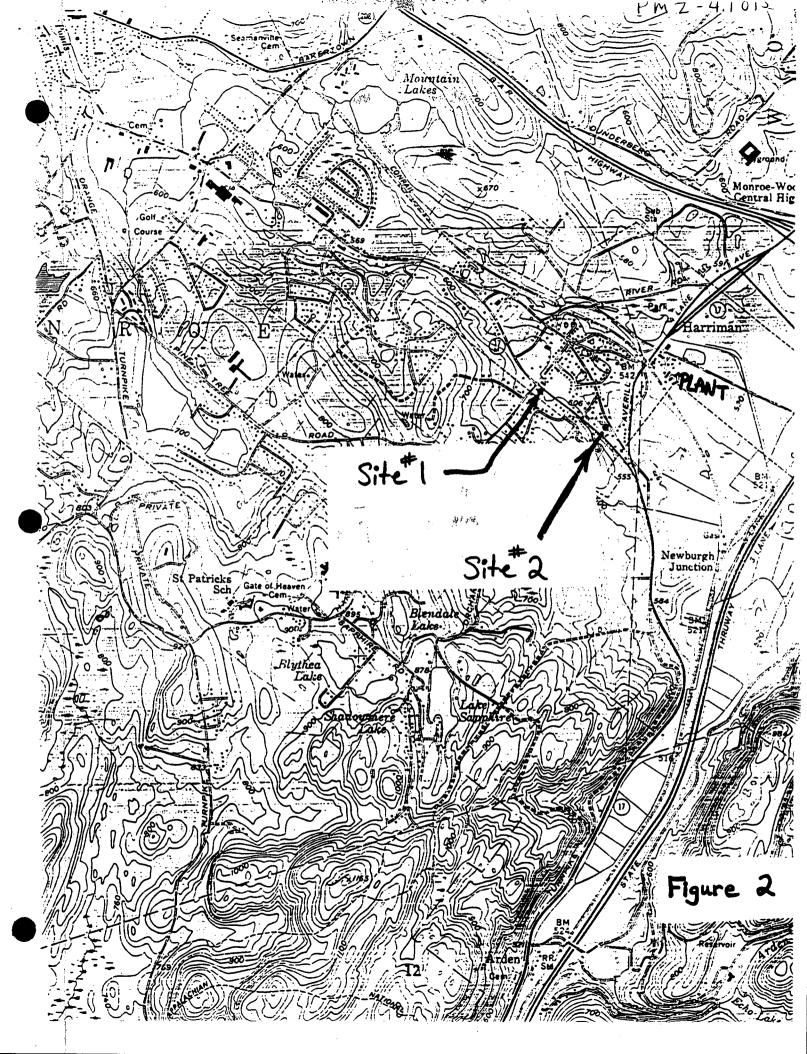
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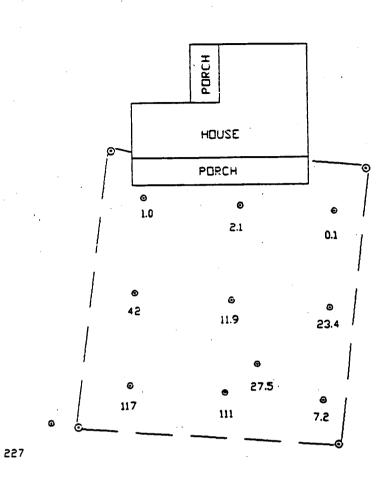
APPENDIX A

Figures





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⊙ Pole #132

© Souble Facturiou	FIGURE 3- MERCURY CONCENTRATION MAP
© Fence Corner Post ① Telephone Pole	PYRIDIUM MERCURY DISPOSAL SITE NO. 2
227 Mercury concentration (ng/kg)	HARRIMAN, NEW YORK
2cale 1, = 50.	OCTOBER 26 - 29, 1994

APPENDIX B
Tables

Table 1. SOIL COMPARISON VALUES FOR RESIDENTIAL EXPOSURE
TO INORGANIC MERCURY

Duration of Exposure:	COMPARISON VALUE				
	Pica Child ¹	gestion of Soil Child ²	Adult ³	Soil a	nd /n Produce*** Adult ³
Short-term*	14 ppm		9800 ppm		
Long-term**	0.6 ppm	47 ppm	420 ppm	1.5 ppm	4.9 ppm

¹Assumes child with pica weighs 10 kg and ingests 5000 milligrams (mg) of soil per day.

²Assumes a 13.2 kg child, and a time-weighted-average soil ingestion of 85.2 mg soil per day to account for weekly and seasonal variability when estimating chronic exposures.

³Assumes an adult weighs 70 kg and ingests 50 mg of soil per day.

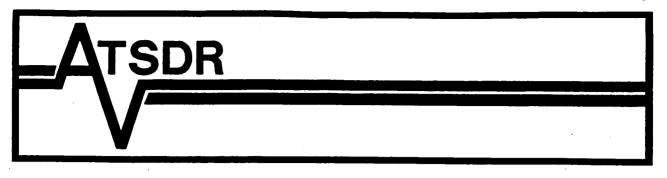
^{*}ATSDR has established short-term level for inorganic mercury of 0.007 milligram per kilogram per day (mg/kg/day). It is a level of short-term exposure to inorganic mercury below which adverse health effects are unlikely to occur.

^{**}US EPA has established a long-term level for inorganic mercury of 0.0003 mg/kg/day. It is a level of long-term exposure to inorganic mercury below which adverse health effects are unlikely to occur.

^{***}Assumes 40% consumption of homegrown fruits and vegetables.

APPENDIX C

Public Health Hazard Categories



Public Health Assessment Guidance Manual

March 1992



U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Public Health Service Agency for Toxic Substances and Disease Registry Atlanta, Georgia 30333

Table 8.1. Criteria and Actions for Levels of Public Health Hazard

CATEGORY A URGENT PUBLIC HEALTH HAZARD

This category is used for sites that pose an urgent public health hazard as the result of short-term exposures to hazardous substances.

Criteria:

Evidence exists that exposures have occurred, are occurring, or are likely to occur in the future:

and

the estimated exposures are to a substance or substances at concentrations in the environment that, upon short-term exposures (less than 1 year), can cause adverse health effects to any segment of the receptor population. The adverse health effect can be the result of either carcinogenic or noncarcinogenic toxicity from a chemical exposure. For a noncarcinogenic toxic effect, the exposure exceeds an acute or intermediate minimal risk level (MRL) established in the ATSDR Toxicological Profiles or other comparable value;

and/or

community-specific health outcome data indicate that the site has had an adverse impact on human health that requires rapid intervention;

and/or

physical hazards at the site pose an imminent risk of physical injury.

ATSDR Actions:

ATSDR will expeditiously issue a health advisory that includes recommendations to mitigate the health risks posed by the site. The recommendations issued in the health advisory and/or health assessment should be consistent with the degree of hazard and temporal concerns posed by exposures to hazardous substances at the site.

Based on the degree of hazard posed by the site and the presence of sufficiently defined current, past, or future completed exposure pathways, the following public health actions can be recommended:

- biologic indicators of exposure study;
- biomedical testing:
- case study;
- disease and symptom prevalence study;

(Continued on next page)

CATEGORY B PUBLIC HEALTH HAZARD

This category is used for sites that pose a public health hazard as the result of long-term exposures to hazardous substances.

Criteria:

Evidence exists that exposures have occurred, are occurring, or are likely to occur in the future;

and

the estimated exposures are to a substance or substances at concentrations in the environment that, upon long-term exposures (greater than 1 year), can cause adverse health effects to any segment of the receptor population. The adverse health effect can be the result of either carcinogenic or noncarcinogenic toxicity from a chemical exposure. For a noncarcinogenic toxic effect, the exposure exceeds a chronic MRL established in the ATSDR Toxicological Profiles or other comparable value;

and/or

community-specific health outcome data indicate that the site has had an adverse impact on human health that requires intervention.

ATSDR Actions:

ATSDR will make recommendations in the health assessment to mitigate the health risks posed by the site. The recommendations issued in the health assessment should be consistent with the degree of hazard and temporal concerns posed by exposures to hazardous substances at the site.

Based on the degree of hazard posed by the site and the presence of sufficiently defined current, past, or future completed exposure pathways, the following public health actions can be recommended:

- biologic indicators of exposure study;
- biomedical testing
- case study;
- disease and symptom prevalence study;
- community health investigation:

(Continued on next page)

Table 8.1. Continued

CATEGORY A URGENT PUBLIC HEALTH HAZARD (continued)

- · community health investigation;
- registries;
- site-specific surveillance;
- voluntary residents tracking system;
- cluster investigation;
- health statistics review;
- health professional education;
- community health education; and/or
- substance-specific applied research.

CATEGORY B PUBLIC HEALTH HAZARD (continued)

- registries;
- site-specific surveillance;
- voluntary residents tracking system;
- cluster investigation;
- health statistics review;
- health professional education;
- community health education; and/or
- substance-specific applied research.

Table 8.1. Continued

CATEGORY C INDETERMINATE PUBLIC HEALTH HAZARD

This category is used for sites with incomplete information.

Criteria:

The limited available data do not indicate that humans are being or have been exposed to levels of contamination that would be expected to cause adverse health effects. However, data or information are not available for all environmental media to which humans may be exposed;

and

there are insufficient or no community-specific health outcome data to indicate that the site has had an adverse impact on human health.

ATSDR Actions:

ATSDR will make recommendations in the health assessment to identify the data or information needed to adequately assess the public health risks posed by the site.

Public health actions recommended in this category will depend on the hazard potential of the site, specifically as it relates to the potential for human exposure of public health concern.

If the potential for exposure is high, initial health actions aimed at determining the population with the greatest risk of exposure can be recommended. Such health actions include:

- community health investigation;
- · health statistics review;
- cluster investigation; and
- symptom and disease prevalence study.

If the population of concern can be determined through these or other actions, any of the remaining follow-up health activities listed under categories A and B may be recommended.

In addition, if data become available suggesting that human exposure to hazardous substances at levels of public health concern is occurring or has occurred in the past, ATSDR will reevaluate the need for any followup.

CATEGORY D NO APPARENT PUBLIC HEALTH HAZARD

This category is used for sites where human exposure to contaminated media is occurring or has occurred in the past, but the exposure is below a level of health hazard.

Criteria:

Exposures do not exceed an ATSDR chronic MRL or other comparable value;

and

data are available for all environmental media to which humans are being exposed;

and

there are no community-specific health outcome data to indicate that the site has had an adverse impact on human health.

ATSDR Actions:

If appropriate, ATSDR will make recommendations for monitoring or other removal and/or remedial actions needed to ensure that humans are not exposed to significant concentrations of hazardous substances in the future.

The following health actions, which may be recommended in this category, are based on information indicating that no human exposure is occurring or has occurred in the past to hazardous substances at levels of public health concern. The following health actions are recommended for sites in this category:

- community health education:
- health professional education;
- community health investigation; and
- voluntary residents tracking system.

However, if data become available suggesting that human exposure to hazardous substances at levels of public health concern is occurring, or has occurred in the past, ATSDR will reevaluate the need for any followup.

Table 8.1. Continued

CATEGORY E NO PUBLIC HEALTH HAZARD

This category is used for sites that do not pose a public health hazard.

Criteria:

There is no evidence of current or past human exposure to contaminated media;

and

future exposures to contaminated media are not likely to occur;

and

there are no community-specific health outcome data to indicate that the site has had an adverse impact on human health.

ATSDR Actions:

No public health actions are recommended at this time because no human exposure is occurring, has occurred in the past, or is likely to occur in the future that may be of public health concern.

APPENDIX D
Response to Public Comment

Pyridium Mercury Disposal Site #2 Response to Public Comment

This response to public comment was prepared to answer the public's comments on the Pyridium Mercury Disposal Site #2 Health Consultation. The public was invited to comment during the public comment period which ran from June 9, 1995 to July 13, 1995. One reply form was received by the New York State Department of Health. The following is a summary of our response to the comment received. If you have any questions, contact the Health Liaison Program at the toll-free number 1-800-458-1158, extension 402.

Comment

A previous resident of the area was concerned about potential past exposures and possible follow-up testing.

Response

New York State Department of Health medical staff from the Bureau of Environmental and Occupational Epidemiology responded by telephone and a follow-up letter. Responses to medical questions are considered confidential information; therefore, we are not able to provide details of the conversation or follow-up letter.